

EXHIBIT E

Cameron Abaqueta
1879 Dembridge Dr
Davidson, NC 28036

January 24, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Cameron Abaqueta. I am a current Division I athlete at the University of Florida and my NCAA ECID number is 2003824830. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,

/s/ Cameron Abaqueta

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF CAMERON ABAQUETA

I, Cameron Abaqueta, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a junior at the University of Florida and, until December 2024, I was a member of its NCAA Division I men's swim team. I am thus a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. I began swimming when I was 4 years old. I love the sport and have put in countless hours developing as a swimmer. Although I initially split my time between swimming and tennis, I made the decision at the age of 10 to focus exclusively on swimming. In high school, I was a four-time NCISAA state champion in the 100-meter backstroke event. Along with three teammates, I also set a U16 national record in the 4x100 free relay. One of my proudest achievements so far was being a Scholastic All-American all four years. To do so, I had to maintain a 3.5 GPA while also qualifying for the Junior Nationals.

3. Academics were an important consideration for me during the recruitment process. I received interest from many of the top tier swimming programs in the country and ultimately decided on the University of Florida because of its strong tradition in both academics and athletics. The Florida swim team has consistently achieved at the highest national level for several years.

4. During my first two years swimming for Florida I have competed in over a dozen meets, placing in the top five at least six times. I also earned SEC Men's Freshman of the Week in January of 2023 and SEC First-Year Academic Honor Roll for the 2022-2023 season.

1 5. About six months ago the coaches told the team generally about a possible
2 settlement in this lawsuit and that it had something to do with roster limits. The information did
3 not seem to have any impact on us and so we went back to practice as normal, focusing on our
4 training for the upcoming season.

5 6. Then, in December 2024, I was called in for a meeting with two of the assistant
6 coaches. They informed me that related to the roster limits being created as part of the
7 settlement, the SEC had met and decided to further limit the size of men's swim teams to 22
8 starting next season. I was told that because of those limits they would have to make cuts to the
9 current roster and I was being cut from the team, effective immediately. There were five other
10 swimmers, all friends of mine, who were also cut from the team that day. I was told that
11 additional cuts will be made at the end of the season.

12 7. Being cut from the team mid-season came as a total shock, and it has been
13 extremely disappointing, to say the least. Swimming has been such an important part of my life
14 for the last ten years. I've invested countless hours training in the pool to improve as a swimmer,
15 striving to get better and better each day, each month, each year.

16 8. My training schedule consisted of 20 hours of swimming per week, plus an
17 additional 5 hours of weightlifting per week, during both my freshman and sophomore years of
18 college. I was willing and ready to put in the work needed to meet the demands of a collegiate
19 swimming program. I thought that my significant efforts would at least result in opportunities
20 to compete in the sport I love.

21 9. If roster limits remain in place, it is unlikely that I will be able to swim at the
22 collegiate level again. I struggle to understand why roster limits are being imposed and why
23 they are being implemented so suddenly. Transferring is not an option for me given the strong
24 connections I have made here at Florida. I also do not want to disrupt my progress towards
25 graduating with a finance degree, and Florida has a strong finance program.

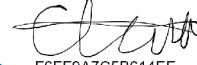
26 10. I will have to bear significant financial costs as a result of being cut from the
27 swim team. The status of my athletic scholarship for the next academic year is uncertain. Even
28 setting aside my athletic scholarship, I will not have access to athletic facilities and resources

like academic tutoring and advising. These are critical services that I relied upon as a student.

11. The NCAA is supposed to provide avenues for student athletes like me to develop and compete when we earn it. The roster limits contradict this mission. Instead, the implementation of roster limits will result in thousands of student athletes like me being shut out of collegiate athletics altogether. The settlement should not be approved if it will result in the imposition of these unfair roster limits.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Davidson, North Carolina
January ²⁴, 2025

Signed by:

F6FF9A7C5B614EE...
Cameron Abaqueta
NCAA ECID No. 2003824830
18719 Dembridge Dr
Davidson, NC 28036

Julie Addison
475 Grayrock Drive
Crozet, VA 22932

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Julie Addison. I am a current Division I athlete at the College of William & Mary and my NCAA ECID number is 2303829244. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Julie Addison

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF JULIE ADDISON

I, Julie Addison, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a sophomore at the College of William & Mary and am a member of the NCAA Division I Men's and Women's Swim Team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. Our coaches have explained to us that roster limits if implemented, will cause our team to incur and suffer from cuts of four of our teammates. We do not yet know if these will be athletes currently on our team, incoming freshmen, or a combination. We do not want this and feel we should not have to worry about losing teammates or have any concerns surrounding our own position on the team. Added stress does not help performance or team spirit. Nor will a limited roster benefit our team.

3. We function as a team in and out of the pool. We eat together, study together, relax together, and live together; we have strong mentoring systems on our team and pride ourselves on helping one another in and out of the pool; we are a tight, supportive group. We worked incredibly hard throughout high school in order to have this opportunity; we all want to remain on this team and at our school, together. We do not feel roster limits help our team or our sport, but they will negatively impact those who are cut and our team at large.

I declare under penalty of perjury that the foregoing is true and correct.

1 Dated: Williamsburg, VA
2 January 28, 2025

Signed by:

Julie Addison

371E80CA66C2417...

Julie Addison

NCAA ECID No. 2303829244

475 Grayrock Drive

Crozet, VA 22932

Zoe Arakelian

19 Red Hill Road
Warren, NJ 07059

January 27, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken,

My name is Zoe Arakelian. I am a current Division I athlete at William & Mary; my NCAA ECID number is 2108291394. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate the firm of Mololamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Zoe Arakelian



1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF ZOE ARAKELIAN**

9 I, Zoe Arakelian, hereby declare as follows pursuant to 28 U.S.C. §1746:

10 1. I am a sophomore at William & Mary and am a member of the NCAA Division I
11 Men's and Women's Swim Team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 2. Our coaches have explained to us that roster limits, if implemented, will cause our
14 team to incur and suffer from cuts of four of our teammates. We do not yet know if these will be
15 athletes currently on our team, incoming freshmen, or a combination. We do not want this and feel
16 we should not have to worry about losing teammates or have any concerns surrounding our own
17 position on the team. Added stress does not help performance or team spirit. Nor will a limited
18 roster benefit our team.

19 3. We function as a team in and out of the pool. We eat together, study together, relax
20 together, and live together; we have strong mentoring systems on our team and pride ourselves on
21 helping one another in and out of the pool; we are a tight, supportive group. We worked incredibly
22 hard throughout high school in order to have this opportunity; we all want to remain on this team
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1 and at our school, together. We do not feel roster limits help our team or our sport, but they will
2 negatively impact those who are cut and our team at large.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Dated: Williamsburg, VA

5 January 27, 2025



Zoe Arakelian

NCAA ECID No. 2108291394

19 Red Hill Road

Warren, NJ 07059

Ryann Aycock
1971 University Blvd.
Lynchburg, VA 24515

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Ryann Aycock. I am a current Division I athlete at Liberty University and my NCAA ECID number is 2106206268. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Ryann Aycock

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF RYANN AYCOCK**

9 I, Ryann Aycock, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a sophomore at Liberty University and am a member of the NCAA Division
11 I women's cross country and track team. I am a member of the Injunctive Relief Settlement Class
12 and object both individually and on behalf of the class.

13 2. I started running cross country in middle school and gave up all other sports to
14 focus on running in the 9th grade. Outside of school, running took up most of my time, between
15 2-hour practices every day and countless weekends spent at meets. I also dealt with a couple
16 running-related injuries in high school from training at a high level that led to more time spent
17 doing rehab, going to doctor's appointments, and cross training in the pool as I built back strength
18 and fitness to be able to run again.

19 3. In high school, I was able to hit Liberty's team standards for track and cross
20 country and I earned a partial athletic scholarship. I won 11 state titles in the NCISAA and was
21 at the top of my class of recruits in North Carolina. Despite this, it would have been very
22 challenging for me to even make Liberty's roster had the roster limits been in place during my
23 senior year.

24 4. I was recruited by several schools including East Carolina University, NC State
25 University, and the University of Delaware. However, I chose Liberty University because of
26 their mission, their team culture, and their coaching staff. Up front, I was promised a small
27 scholarship from Liberty that I was able to increase by hitting one of the scholarship time
28 standards for the team. I turned down substantial financial offers from both University of

1 Delaware and East Carolina University in favor of Liberty. My coach told me that my scholarship
2 could not be decreased, only increased, during my time at Liberty.

3 5. I first heard about roster limits last summer (2024) through Instagram accounts
4 like the Stride Report. This past November, our assistant athletic director spoke to the entire
5 track team about the upcoming roster limits, which was the first time some of my teammates
6 even heard about the cuts. All athletes will be allowed to finish out the 2024/25 season, but
7 starting fall of 2025, Liberty will have to adhere to the roster limits set by the NCAA if the House
8 Settlement passes. We currently have 32 girls on our cross country team and almost 70 girls total
9 on our track team, meaning that around 25 girls could lose their spots.

10 6. As a scholarship athlete at Liberty University, I am less at risk of losing my spot
11 on the team. However, the sport of cross country can be very unpredictable, as injuries are
12 somewhat common and can change the course of a season. I do not know how the House
13 Settlement factors in injuries, but there is a possibility that I could lose my spot, as I am currently
14 returning from an injury from cross country season. The House Settlement puts some pressure
15 on my return to competition, as I feel that I must perform well as I get back into racing to prove
16 that I still belong on the team. Additionally, I have seen many of my teammates facing similar
17 or even more pressure, as they feel like they now must compete with one another to stay on the
18 team next year. Girls are having to reassess their future at Liberty, making decisions now whether
19 they want to stay at Liberty as a non-athlete or transfer to another smaller school to continue
20 running. Almost all the girls on our team who are most heavily affected are freshman this year,
21 meaning that many of them are having to make big decisions about next year only a few months
22 after arriving on campus. The House Settlement is causing uncertainty about the future for
23 everyone involved, leading to more pressure on our younger athletes in both their races and the
24 decisions they are forced to make.

25 7. If I were cut from the team, I would lose my athletic scholarship, which covers
26 my cost of living, dining plan, and other fees. I would also lose access to the tutors and academic
27 advisors provided by the team, as well as the opportunity to eat at the athlete-only dining hall.
28 Additionally, many of my friendships would be affected by the roster cuts if I or any of my

1 teammates lose their spots, as the girls on my team are my closest friends.

2 8. Running cross country and track at Liberty has been one of the greatest
3 opportunities in my life. I object to the roster limits clause of the House Settlement because of
4 the devastating impact it will have on my own team and countless other student athletes across
5 the country.

6 I declare under penalty of perjury that the foregoing is true and correct.

7 Dated: Lynchburg, Virginia

8 January 28, 2025



Ryann Aycock
NCAA ECID No. 2106206268
1971 University Blvd.
Lynchburg, VA 24515

Melinda Aznar Klein
5417 Carmel Park Drive
Charlotte, North Carolina 28226

January 29, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Melinda Aznar Klein. I am a high school student aspiring to be a future Division I athlete, and a member of the Injunctive Relief Class. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,


Melinda Aznar Klein

1 **UNITED STATES DISTRICT COURT**
2 **NORTHERN DISTRICT OF CALIFORNIA**
3 **OAKLAND DIVISION**

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF MELINDA AZNAR KLEIN**

9 I, Melinda Aznar Klein, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am 18 years old and am in 12th grade at Deerfield Academy. I have been
11 competing as a swimmer since I was 8 years old and have been a competitive rower throughout
12 high school. I have committed to row D1 at Boston College starting Fall 2025 and was recruited
13 for the women's rowing team.

14 2. I understand that the settlement in this lawsuit will govern NCAA Division I
15 sports for the next decade, which is when I will be in college. I therefore am a class member
16 who could be affected by the terms of the settlement. I object to the settlement for the reasons
17 stated below, both for myself and for other class members like me.

18 3. I practice 6-7 days per week and look forward to competing at the D1 level in
19 college.

20 4. My mother, brother, grandfather, cousin aunt, and uncle have all competed in
21 college athletics. They have always encouraged our family to play sports and aspire for collegiate
22 opportunities. My family has always shared the many positive things that came from sports,
23 especially college sports. Structure in schedule, aspiring to always do better, learning how to
24 deal with failure, learning how to deal with success, learning how to work with others, and
25 learning how to be coached in different ways. .

26 5. I believe having roster limits will destroy youth sports and developing athletes. I
27 believe that many families won't see the purpose if there are no long-term opportunities for
28 growth. I believe roster limits will impact the mental health current athletes and future athletes.

1 If current athletes are stripped of their current roles, they will most likely find it hard to find new
2 ones, will lose all support they were promised, from academic support, athletic support, mental
3 health support and professional development support preparing for post college.

4 6. Please remove roster limits from this and allow for athletes to participate, allow
5 for current athletes to be grandfathered into their roster they signed on with, and allow future
6 athletes to participate no matter what the numbers are.

7 I declare under penalty of perjury that the foregoing is true and correct.

8 Dated: Charlotte, North Carolina
9 January 30, 2025



Melinda Aznar Klein
5417 Carmel Park Drive
Charlotte NC 28226

Natalie Grace Aznar Klein
5417 Carmel Park Drive
Charlotte, North Carolina 28207

January 29, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Natalie Aznar Klein. I am a middle school student aspiring to be a future Division I athlete, and a member of the Injunctive Relief Class. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,

Natalie Aznar Klein

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF NATALIE AZNAR KLEIN**

9 I, Natalie Aznar Klein hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am 13 years old and am in 7th grade. I have been competing and training as a
11 basketball player for 4 years and a rower for 2 years. I have dedicated my time and efforts almost
12 every day in hopes to compete in college at the D1 level.

13 2. I understand that the settlement in this lawsuit will govern NCAA Division I
14 sports for the next decade, which is when I will be in college. I therefore am a class member
15 who could be affected by the terms of the settlement. I object to the settlement for the reasons
16 stated below, both for myself and for other class members like me.

17 3. I currently train 5 or 6 days a week in basketball and 3 days a week in rowing. I
18 enjoy my time with my teammates and the friendships I have made. We have common goals and
19 realize that being in a sport helps us become better citizens – by being dedicated, kind and driven
20 in the pool, on the field and in the classroom.

21 4. I am very proud of my accomplishments in both of my sports. To many people,
22 they might not be impressed with my results, because I am not winning championships or making
23 every travel team. But I have knowledge that most people do not. I have older siblings that have
24 also competed in Division 1 and Division 3 sports and who developed later in their athletic
25 careers. If I am patient and allow my body to grow and develop while I continue to work on
26 skills and personal development, success will come. I know that all good things come with time.
27 However, given the new restrictions with roster limits, it is very unlikely that time will be on my
28 side and that opportunities will be waiting for me.

1 5. My mother, uncle, sister, brother, grandfather, cousins and aunt have all
2 competed in college athletics. They have always encouraged our family to play sports and aspire
3 for collegiate opportunities. My family has always shared the many positive things that came
4 from sports, especially college sports. Structure in schedule, aspiring to always do better,
5 learning how to deal with failure, learning how to deal with success, learning how to work with
6 others, and learning how to be coached in different ways.

7 6. I believe having roster limits will destroy youth sports. I believe that many
8 families won't see the purpose if there are no long-term opportunities for growth and
9 development. I believe roster limits will impact the mental health current athletes and future
10 athletes. If current athletes are stripped of their current roles, they will most likely find it hard
11 to find new ones, will lose all support they were promised, from academic support, athletic
12 support, mental health support and professional development support preparing for post college.

13 7. Please remove roster limits from this and allow for athletes to participate, allow
14 for current athletes to be grandfathered into their roster they signed on with, and allow future
15 athletes to participate no matter what the numbers are.

16 I declare under penalty of perjury that the foregoing is true and correct.

17 Dated: Charlotte, North Carolina
18 January 30, 2025



Natalie Aznar Klein
5417 Carmel Park Drive
Charlotte, NC 28226

Will Benoit
21 Orford Street
Lowell, MA 01854

January 15, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Will Benoit. I am a current Division I athlete at the University of Massachusetts, Lowell and my NCAA ECID number is 2010946073. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Will Benoit

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF WILL BENOIT**

9 I, Will Benoit, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. My name is Will Benoit and I am a member of the track and field team at the
11 University of Massachusetts, Lowell. I am a member of the Injunctive Relief Settlement Class
12 and object on behalf of the class.

13 2. Four years ago, I was blessed with an opportunity to become a UMass Lowell
14 River Hawk and realize my dream of becoming a Division One track and field athlete. Since
15 then, I have met my best friends, I have pushed myself to accomplish athletic feats I would have
16 deemed impossible at my time of commitment, and I received a high-class education that has
17 prepared me for life beyond the track.

18 3. But this life I am so grateful to be living, and this team I feel so privileged to be
19 a part of, would have been no more than a far-off dream if the House v. NCAA settlement had
20 occurred before my freshman year.

21 4. I came from a small high school in southern Massachusetts and a graduating class
22 of only 195 students. Being from a small school, I was often overlooked as an athlete. I had
23 inexperienced coaches and an athletic program that lacked the funds to pay for trips to the
24 competitive meets I longed to run in.

25 5. I desperately emailed dozens of colleges and universities, eagerly explaining my
26 situation and hoping they would give me a chance. I prayed my passion for running would prove
27 evident to these established coaches and that I could be awarded a walk-on spot.

28 6. I was hungry to compete. I was hungry to get better. And I was willing to work

1 harder than anyone else.

2 7. Finally, after many silent weeks, I got an email from Coach Gary Gardner and his
3 coaching staff at UMass Lowell. I was ecstatic. I took a visit early in 2020 and committed a few
4 months later. What sold me most on UMass Lowell were two things.

5 8. The first selling point for UMass Lowell was Gary's recognition of my drive and
6 his emphasis on consistency and persistence. He told me in our first Zoom phone call, "The work
7 you are doing now may not show tomorrow, it may not show this year, it may not even show
8 until 2 or 3 years down the line, but if you stay consistent, the results will come." I was sold. I
9 got to work and never looked back. He had the foresight that I was looking for. While I may not
10 have been the best runner coming out of the class of 2021, he recognized that I was an under-
11 trained and thus, underrated athlete with a burning desire to get better. He gave me his time and
12 attention and slowly but surely, the results started coming.

13 9. I did not make a conference roster for my first year and a half in college. Since
14 then, however, I have had the honor of being part of five conference championships, and multiple
15 all-conference teams as an individual. More importantly, I am now helping mentor and be a role
16 model to the next generation of Riverhawks. As Gary said, the results didn't come quick and
17 they did not come easy.

18 10. To me, college athletics is about growing and developing athletes, not merely
19 taking the best high schoolers you can find and pushing them through a system like cogs in a
20 machine. The House v. NCAA settlement would effectively take away this system of athletic
21 development from hundreds of future students in situations like my own. I object to the roster
22 limits and do not think they belong in college athletics.

23 11. The second selling point for me was the team camaraderie. Gary and this program
24 have a special gift of finding motivated athletes who are eager to become great. It also happens
25 to be that these student-athletes come together to form the most genuine and loving community
26 I have ever been a part of. Our team is reliant on the size of our roster. And our relatively large
27 roster has shaped UMass Lowell's championship-winning culture. When you step on the track,
28 you are running for everyone on the team, not just yourself and your event group. From the best

1 guy to the last, everyone makes a difference. As Gary always says, "The last guy pushes the next
2 guy, who pushes the next."

3 12. The House v. NCAA settlement would crush our team and bring many promising
4 young careers to an end. Had this come into effect my freshman year I never would have been a
5 first-team all-conference runner. I never would have traveled to Wisconsin, Virginia, and North
6 Carolina with my best friends. I never would have met these friends. I never would have earned
7 a scholarship to pay for an education that I otherwise would have struggled to afford.

8 13. The House v. NCAA settlement would have taken this all away from me, and I
9 can only humbly ask that you not take these opportunities away from any student-athlete to
10 come.

11 I declare under penalty of perjury that the foregoing is true and correct.

12 Dated: Lowell, Massachusetts
13 January 15, 2025



Will Benoit

NCAA ECID No. 2010946073

[Mailing Address]

21 Orford Street

Lowell, MA 01854

Corey Berry
4243 Zephyrhills Dr. NW
Acworth, GA 30101

January 25, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Corey Berry. I am a current Division I athlete at Kennesaw State University and my NCAA ECID number is 2010940284. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Corey Berry

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF COREY BERRY

I, Corey Berry, hereby declare as follows pursuant to 28 U.S.C. §1746:

1. I am a sophomore at Kennesaw State University and I am a member of the NCAA Division I men's baseball team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. To become a division 1 college athlete took multiple hours of preparation. In high school, I spent 30-40 hours a week to have the chance of being a Division I college athlete. I gave up my evenings, my weekends, and my school breaks including winter break and spring break. I was not able to see my sister's games or spend time with friends during the season. I chose this because I wanted to play baseball in college. My high school coach did not really help us get recruited to play at the next level so I did everything on my own and with the help of my travel team coach.

3. My sophomore year of high school was taken away by COVID. I would have had a chance to play varsity that year and improve my skills. I played varsity for my junior and senior year. In junior year, I won the defensive mvp for my team and in senior year, I won the offensive MVP for my team. I was voted first team all region for both years. We made the playoffs both years and my junior year we made it to the Elite Eight and tied a school record for wins in a season.

1
2 4. Recruiting did not go as well as I wanted it to. I was undersized even though my
3 skills were competitive. I was fortunate to get a juco opportunity at Wallace Community
4 College in Dothan, Alabama. I played all games my freshman year and we were conference
5 runners-up. My second year was cut short due to a season-ending surgery. Thankfully,
6 Kennesaw State University had offered me that summer before. The Kennesaw offer was a
7 good one and promised that I could continue playing for the last three years there and the offer
8 was not taken away even after my injury. I know if I do my part, I will be on the team. I make
9 A's and B's and work out daily even in the off season. I put in approximately 40 hours weekly
10 to improve. The scholarship I was given helps my family tremendously to be able to send me
11 to college. I also play baseball in the summer which means I cannot get a part-time job. This
12 summer I will be in Minnesota all summer and play 6 days per week while living with a host
13 family.

14 5. I learned about the proposal for roster limits on the news and the coach has
15 mentioned them as well. Roster limits are very concerning for me. My height and weight are
16 still considered undersized so many coaches will not even consider offering me a scholarship.
17 My goal is to continue my education and continue playing as long as I can. I already lost some
18 credits by transferring from a juco in a different state and if I get cut and have to transfer again,
19 it will delay my graduation. I may have to change my major and it is already going to take me
20 an extra year to graduate due to prerequisites and requirements. There will not be a place for
21 many players including some of my teammates if roster limits are put in place. Many of these
22 guys will quit school if that happens. I would probably quit school as well because I love
23 baseball and if I cannot play anymore, I will have to make some decisions.

24 6. This idea of roster limits is taking a toll on my teammates and I. It puts a lot

1 more unnecessary pressure on this season and the stats I have to get to stay on the team. I am
2 already fighting for playing time but I feel like if I screw up, then I won't have a roster spot for
3 next year at a school and team I have grown to love. The mental toll is going to make things
4 stressful as a team. Our team would play better if this was not an option for next year. The
5 season is already a grind when we play 4 games a week and have a lot of travel. Many of our
6 players have not traveled this much. We are also beginning play in a new conference this year
7 which is making competition harder anyway. Then we still have to keep our grades up, get
8 enough sleep and eat to maintain weight.

9 7. If I am cut, I will lose lots of financial aid which means I will have to take about
10 10,000 more dollars in school loans per year. My family will not be able to pay what I lose. I
11 will truly miss being part of my team and being with the guys outside of baseball. I will have to
12 change my room on campus and lose my roommates who have become friends and teammates.
13 I will probably have to move back home because I will not be able to get a room on campus. I
14 will not have the support academically which helps me stay on track since so much time is
15 spent on baseball. I will lose the treatment of our athletic trainer which has already helped me
16 recover from shin splints and muscle tightness. I just turned 21 and I have no idea what I will
17 do if I get cut. The whole situation sounds hopeless.

18 8. I have considered the transfer portal but since all teams are full, will there be
19 any place to go. The past season's portal already had hundreds of guys who did not get picked
20 up. I need to stay at my current school to be able to finish my degree but I won't want to do
21 that if I cannot play baseball. Trying to guess what a coach will be like and if I will get playing
22 time from a portal offer are stressful and not guaranteed. I had a juco teammate who had a DI
23 offer and it was withdrawn the week before school started. I have heard nightmares from other
24 schools over recruiting guys and this will only make things worse.

1 9. Please do not implement roster limits for college sports. Many sports will be
2 devastated including baseball. Baseball needs lots of pitchers and currently we have about 20
3 on our roster. If there are only 34 spots then there will not be enough position players to
4 survive the season if there are injuries or people cannot finish the season. Baseball pitchers
5 cannot pitch every day and take care of their arms. They must have days to rest. If teams play 4
6 games weekly, they will usually need a minimum of 12 pitchers and that is if everything goes
7 well which it will not every game so teams will have to keep 20 or more pitchers on the roster.
8 Colleges have already cut other sports and teams.

9 10. I urge you to consider all of the athletes and families who will lose if you
10 implement this rule that will have a negative impact on athletes for years to come.

11 I declare under penalty of perjury that the foregoing is true and correct.

12 Dated: Kennesaw, Georgia

13 January 25, 2025

Signed by:



Corey Berry

NCAA ECID No. 2010940284

4243 Zephyrhills Dr NW

Acworth, GA 30101

Carly Bixby
5420 Shenandoah Lane N
Plymouth, MN 55446

January 20, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Carly Bixby. I am a current Division I athlete at Auburn University and my NCAA ECID number is 1909692413. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Carly Bixby

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION
6

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

7
8 **DECLARATION OF CARLY BIXBY**

9 I, Carly Bixby, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman and member of the swim team at Auburn University. I am a
11 member of the Injunctive Relief Settlement Class and object individually and on behalf of the
12 class.

13 2. I began swimming when I was seven and started competing more seriously while
14 in middle school. In high school, I was a Minnesota Class A state champion in the 100 Y Fly, I
15 went to the USA winter junior nationals in 2022 and 2023, and I was named a USA Swimming
16 Scholastic All-American in 2021, 2022, and 2023. This required me to maintain a 3.5 GPA
17 while recording a Winter Junior Nationals qualifying time.

18 3. I started receiving college recruiting attention early on in my junior year. I was
19 ecstatic. It had been my dream to make it to the collegiate level since I was a child. I stuck with
20 swimming because of the community and friends I made, and I wanted to continue to be part of
21 that community. I ultimately made my verbal commitment to Auburn in October of 2022 and
22 signed my National Letter of Intent on November 8, 2023. Auburn's swimming program was a
23 big reason for my choice. I loved its team culture, the coaches and the environment. Everyone
24 on the team was kind and it felt like a community.

25 4. I first heard about the settlement the August before I started college. The roster
26 limits will require the program to shrink to just 30 athletes next season. There are currently 43
27 swimmers and divers on the women's roster. So, after accounting for graduating seniors and
28 incoming recruits, at least 13 swimmers and divers will have to be cut from the team. The

1 decisions around who will be cut are looming over everyone's head. This has taxed the team's
2 culture and cohesiveness. We are living with the uncertainty of whether we will be the ones cut
3 and what we will do if so. We feel like we are competing against each other to avoid being cut
4 due to these limits.

5 5. My anxiety over the situation is made worse by the financial impacts. If I am cut
6 from the swim program, I would lose a number of benefits, including: the remaining three years
7 of my athletic scholarship, access to academic resources like free tutoring, access to athlete
8 dining facilities, access to the wellness kitchen, and free healthcare through our team doctor. In
9 addition, prior to hearing about the roster limits, I signed a lease for the 2025-2026 school year.
10 In the event I am forced to transfer, it would be very costly to break this agreement- for both me
11 and my parents, who acted as co-signers.

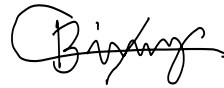
12 6. Even if I decide to transfer, there is no guarantee that I could find a spot on a
13 team. Almost all Division I swim programs will be made to comply with the impending roster
14 limits decision. As a result, the transfer portal will be far more crowded than in the past—not
15 to mention the normal difficulties associated with transferring. It is unlikely that all my class
16 credits would transfer, making it difficult to graduate on schedule in 2028. In order to meet
17 school specific degree requirements, I would probably have to enroll in, and pay for, classes at
18 a new university that I may have already taken at Auburn. This sets up a really difficult choice
19 between staying at Auburn without swimming, my passion, and taking on a substantial financial
20 burden in pursuit of a spot on another collegiate swim team.

21 7. I love Auburn University, and I love my team. I have made so many great friends
22 at this program and it would be terrible to lose them now due to the settlement's roster limits. If
23 people have to be cut, the team just won't be the same.

24 8. The roster limits hurt the ability of Division I programs to provide a space for
25 students to develop as athletes and grow as individuals. I came to Auburn because I loved the
26 culture that the swim team provided. Roster limits have already changed that culture and the
27 culture won't be the same if they go into effect. They should not be approved.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Dated: Plymouth, Minnesota
3 January 21, 2025



4 Carly Bixby
5 NCAA ECID No. 1909692413
6 5420 Shenandoah Lane N
7 Plymouth, MN 55446

Adam Boeheim
2 Quaker Manor Lane
Patterson, NY 12563

January 27, 2025


Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Adam Boeheim. I am a current Division I athlete at Syracuse University and my NCAA ECID number is 2405286584. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,

Signed by:

5BA55463CE19445...
Adam Boeheim

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF ADAM BOEHEIM**

9 I, Adam Boeheim, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman at Syracuse University and a member of its NCAA Division I
11 football team. I am a member of the Injunctive Relief Settlement Class and object to the
12 proposed roster limits, both individually and on behalf of the class.

13 2. I played on the varsity football team at Carmel High School in Carmel, New
14 York, for my sophomore, junior, and senior years. Our team won the New York State
15 Championship in my first year and we were runners-up my senior year; we were section
16 champions all three years I played. During my senior year I was selected to the All-Conference
17 team and received the Golden Dozen Honorable Mention Scholar Athlete award by the
18 Westchester Chapter of The National Football Foundation and College Hall of Fame.

19 3. I love playing football and I wanted to preserve those high school memories, so
20 during my senior year I put together a highlight reel. Our county is pretty small and we don't
21 have a history of sending off Division I athletes, so I initially just did this for myself. But when
22 my family and high school coaches saw it, they said I should try to play in college, so I sent it to
23 some college coaches. I was excited to receive some interest, including the offer of a scholarship
24 from one school.

25 4. But Syracuse has been my dream school since I was young. I travelled with my
26 family to watch many sporting events, and the longtime former basketball coach is a family
27 relative. I took a formal tour of the Syracuse University campus when my older brother
28 considered going to college there. While my older brother decided to attend college elsewhere,

1 Syracuse remained my top choice. So, when the offensive coordinator called me and offered me
2 a preferred walk-on spot on the roster at the end of my senior year, I was thrilled. By that time,
3 I had already received my acceptance to Syracuse University based on academics. At this point
4 I was invited for an athletic visit and tour; after I saw the facilities and met the team and more
5 coaches, I was even more sold on Syracuse. I was being offered a spot on the football team and
6 the chance to prove myself – saying yes was the easiest decision I ever made.

7 5. My first year on the football team has been spent training to develop my strength,
8 speed, and skills. I am an offensive lineman and truly enjoy practicing with my teammates,
9 especially my fellow freshmen. My two roommates are also freshmen on the team. During
10 practices we often play on the “scout team,” where we help the defense prepare by mimicking
11 the offensive scheme of our opponent for the next weekend. We even get to try new positions –
12 while I am an offensive lineman, I sometimes play tight end or fullback on the scout team and
13 enjoy learning something new. The scout team helps us develop during our early years on the
14 team, in hopes of earning a spot on the first or second line in our later years on the team.

15 6. I have formed strong bonds with many of my teammates already, but especially
16 with my classmates on the team. There is a separate facility where we all go not only for training
17 and all our meals, but also for incredible academic counseling and tutoring. I am a Business
18 Analytics major and currently in the 3+3 program, which grants a bachelor’s degree in three
19 years and then guaranteed admission into the three-year law school at Syracuse. This support
20 helps me focus on academics and ensures that football does not get in the way of my goal of
21 getting a law degree.

22 7. Our team also learns much more from being on the team than just football. Our
23 head coach talks to us all the time about what he wants from us – to be good young men. He
24 never says he just wants us to be good football players. And he means it. I already have learned
25 important life lessons from my teammates and coaches, and I am truly in awe thinking of how
26 much more this will be true after the next three years.

27 8. I have tried to keep this statement short, but have recorded it to let the Court know
28 how tragic it would be to have this all ripped away if roster limits are imposed. The proposed

1 roster limit of 105 is less than the approximately 120 players who are currently on the team.
2 Forced roster cuts would tear down the common experiences that my classmates and I have been
3 building on the team. I know that some of us would have to be cut, and regardless of who it is,
4 we all will suffer for it. My roommates and I live together where the other players live, and we
5 spend over half of the day together. We eat meals together. If anyone is cut, they no longer
6 would go to our facility – they could not work out there, eat there, laugh there, or get tutoring
7 there. That is an incredibly important benefit to us, but it also promotes our bonding. Some of
8 us would be broken apart, and the thought of it hurts.

9 9. I also want the Court to understand the problem that roster limits will impose on
10 future walk-on athletes like me. If roster limits existed last year, when I put together a highlight
11 reel and tried to get a college team to take a chance on me, I probably wouldn't have received a
12 spot. Not at Syracuse. And yet I was given a chance, and am proud that I have been told I could
13 survive a cut if it had to happen. But many future athletes won't have that chance if roster limits
14 are imposed. I have already become an example for high school and younger kids who play
15 sports in my county, because we don't send many players to play DI sports. I owe it to them to
16 stand up for their right to find their limits also.

17 10. Finally, even though I might be safe for now if roster limits are imposed, roster
18 limits are also unfair to players who get injured. That can happen to any of us, and it's bad
19 enough on its own. If one of us is injured he has to mend and rehab, he gets to stay on the team.
20 He eats with us, he receives rehab and training in our facility, he is supported in his academics,
21 and he hopes to return to the field. But roster limits could result in injured players being cut
22 because the full limit of players is needed just to implement practices.

23 11. I beg you not to impose roster limits to be forced onto student athletes and their
24 teams. It is my understanding that no one will be cut if roster limits are not imposed. Give us
25 the chance to play out our dreams and to learn the courage to find our limits. Sports and
26 teamwork are an incredibly important part of our education.

27 I declare under penalty of perjury that the foregoing is true and correct.
28

1 Dated: Syracuse, New York
2 January 27, 2025

Signed by:

Adam Boeheim

5BA65463CE19445...

Adam Boeheim
NCAA ECID No. 2405286584
2 Quaker Manor Lane
Patterson, NY 12563

Carmel Bollag
1207 17th Ave E.
Seattle WA 98112

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Carmel Bollag. I am a current Division I athlete at the University of Washington, and my NCAA ECID number is 2203459272. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Carmel Bollag

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

7
8 **DECLARATION OF CARMEL BOLLAG**

9 I, Carmel Bollag, hereby declare as follows pursuant to 28 U.S.C. §1746:

10 1. I am a Sophomore at the University of Washington and a member of the
11 NCAA Division I women's rowing team. I am a member of the Injunctive Relief Settlement
12 Class and object both individually and on behalf of the class.

13 2. Becoming a Division I college athlete was one of the toughest but most
14 rewarding experiences. In high school I devoted six days a week to this sport. From the hours
15 of 3-7:00 pm, my mind was on rowing. Early Saturdays discounted me from fun Friday nights,
16 a Northwest regional championship fell over junior prom weekend, and countless nights up past
17 12 pm were spent catching up on homework. But it was all worth it to see me and my
18 teammates on the podium, reach for new personal erg records, go to the National
19 Championships twice, and form lifelong friendships.

20 3. Growing up in Seattle, I saw the Washington boats gliding over the lake, in
21 awe of their seemingly effortless perfection. From the moment I started rowing I told my
22 family I wanted to row at Washington, a dream that would slowly dwindle over the years as my
23 mind clouded with self-doubt. It wasn't until Sam Greenblatt reached out to me inquiring about
24 my interest in Washington Rowing that a window opened which I thought had closed. The
promise of free meals, snacks, priority class registration, and laundry services were all

1 attractive features of the offer. I was looking at several other teams at the time, none of which I
2 felt particularly drawn to and none of which offered the same benefits. I knew I was looking
3 for a team that would challenge me, had a history of success, and provide an unmatched
4 collegiate athletic experience but I also was considering my academics. Majoring in
5 biochemistry with the hopes of going to dental school - the University of Washington
6 ticked those boxes. After several calls, practice visits, and discussions with my family, I signed
7 the National Letter of Intent that detailed the guarantee of a scholarship for all four years and
8 my commitment to the recruiting process at Washington. I was also given a document which
9 stated the erg standards required to stay on the team. It was stated simply: hit 1:57.5 by the
10 time of sophomore year to stay on the team. It provided a challenge but also a reassurance that
11 how I could ensure my spot was in my hands.

12 4. I first heard about the roster limit of 68 floating around the boathouse at the
13 beginning of the 2045/25 academic year. People were chatting, speculating, and questioning.
14 Coach Yasmin Farooq sat the whole team down in the middle of January and shared the facts
15 she had learned. We were told that an individual's probability of making a boat would
16 influence the cap. That completely butchers the growth path of a rower who has not yet
17 reached their potential. With a current team roster of just over 100, we were all left
18 wondering how that would impact the decision to take on more freshmen, transfers, and
19 fifth years, as well as our own fates too. Because the roster cap would come into effect with
20 the first intercollegiate race, it would mean we no longer would compete at some of the most
21 cherished and iconic fall races such as Head of the Charles or Head of the Lake. The intention
22 for this would be to allow as many rowers as possible to progress the entire fall season with
23 the hope that the long term development would help in eventual selection.

24 5. Rowing is already incredibly exhausting, mentally challenging, and time

1 consuming. The added stress of an impending roster cap is undoubtedly a stressor. To hear that
2 no matter how hard you work, how fast you get, or how devoted you are, a roster cap will
3 eventually have the final say is as discouraging as it is scary.

4 6. I have thought about being cut, and how much I would be losing, how different
5 my life would become. Not only would I lose a team I love but I would also lose the ability to
6 register for classes with priority, three meals a day that save me money and time, tutoring
7 services that provide much needed academic support, the essential resource of mental health
8 services, athletic training and healthcare I wouldn't otherwise have access to, and a book
9 scholarship which aids in the costly nature of chemistry classes at university. But I think the
10 biggest thing I'd lose is myself. Rowing is my biggest passion, has taught me my most
11 valuable lessons, given me a family away from family, and turned me into someone I am
12 incredibly proud to be. It has also given me leadership roles. I haven't always been confident in
13 myself but since joining the Washington rowing team I have learned to recognize my power
14 and resilience and understand that what we do is not easy. I now realize I am capable of hard
15 things and this is not something to brush under the rug or deny others the experience of.

16 7. Immediately after the news was shared the first thought I had was what I would
17 do if I did not make the top 68. I didn't like to think about it but I felt it was necessary. Without
18 a doubt I knew I would be done with collegiate rowing. For me, rowing at Washington is the
19 only answer. I do not wish to be part of any other program, be anywhere but Row Town USA. I
20 would stay in Washington knowing it would never be the same to not being part of the greatest
21 team I have ever had the privilege of being on.


22 8. I completely reject the concept of the roster cap. I believe it goes against
23 everything that makes Washington Rowing such a beautiful program. A program that finds
24 incredibly talented athletes, harnesses their skill, and develops them into champions. If this

1 roster cap had been initiated last year, I don't know if I would still be on the team today. My
2 erg scores this year are much faster than they ever have been, I'm seeing numbers I never
3 thought I could be capable of producing - numbers that would shock my high school self -
4 and the thing I have to thank is time. Time to develop my technique, build strength, and
5 build a place for myself on the team. If I had been cut last year I never would have seen the
6 growth I made this year. It is impossible for someone to prove their full potential in the sport
7 of rowing in a matter of months and this roster cap will forever limit prospective athletes,
8 negatively impacting the entire sport of rowing. I plead to the court to not allow this roster
9 cap to take away the dreams and potentially highly successful rowing careers of athletes.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Dated: Seattle, Washington

12
13 January 26, 2025

14 

Carmel Bollag
NCAA ECID No. 2203459272
1207 17th Ave E,
Seattle WA 98112

Emma Carlton
47-745 Kamehameha Hwy
Kaneohe, HI 96744

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Emma Carlton. I am an alum of the University of Tennessee, where I was a Division I athlete and my NCAA ECID number is 1508264796. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Emma Carlton

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF EMMA CARLTON**

9 I, Emma Carlton, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I graduated from the University of Tennessee in 2023, where I was a Division I
11 swimmer. I am a member of the Injunctive Relief Class and object individually and on behalf
12 of the class.

13 2. Swimming has always been an important part of my life. While I am now retired
14 from swimming, I swam competitively for 15 years, including at the Division I level for two
15 different schools. I swam for two years at Texas A&M before transferring to Tennessee.

16 3. Women's swim teams are like families. At Tennessee, I served as the team
17 captain for two years. It was always critical to me to make sure that my teammates spent time
18 together outside of practice. My teammates were, and are, my best friends, and I know this is
19 true of many collegiate swimmers.

20 4. I made friends at Tennessee and Texas A&M that I will keep for the rest of my
21 life, including my best friend.

22 5. My best friend was not the fastest swimmer on the team. She never qualified for
23 SEC Championships. But she made an incredible positive impact on the team. She served as a
24 leader among us, including on the Student Advisory Council. She encouraged me to explore my
25 passions outside of swimming. She made me—and continues to make me—a better person and
26 teammate.

27 6. In college athletics, it is important to have a team with members who each
28 contribute something different. We need leaders, academics, and positive thinkers. Sometimes

1 these people aren't the fastest, but they are critical to the team. Having a well-rounded team
2 improves every team member's experience.

3 7. If the roster cuts went into effect when I was swimming at Tennessee, my best
4 friend would probably have been cut from the team. And that is not fair. She contributed so
5 much more to our team than just her times. We would have been worse off without her.

6 8. These roster limits are scary. Student athletes are under a lot of pressure to
7 perform. Because of this pressure, my teammates and I saw our team psychologist weekly while
8 in college.

9 9. Oftentimes, I felt so much pressure that I would shut down. I was terrified of
10 failure. And I wasn't alone. I have a friend who would physically shake from performance
11 anxiety. The night before a meet, I would struggle to sleep.

12 10. The possibility of these roster limits only exacerbates the high amount of stress
13 on student-athletes. Roster limits greatly raise the stakes. While before, you might have to worry
14 about not making conference championships or swimming in a meet, now, you have to worry
15 about your spot on the team at all. Student-athletes could lose their financial aid, their friends,
16 the ability to graduate in four years, and the opportunity to keep improving at their sport because
17 of these roster limits. This kind of stress will inevitably impact these athletes' academic
18 performance, too.

19 11. This stress isn't just limited to current Division I athletes. High schoolers who
20 have committed to schools have been told that they may not have a spot on teams next year
21 because of the limits. I cannot imagine committing to a school and then being told after the
22 commitment that you don't have a spot, that's outrageous.

23 12. Entering the transfer portal isn't a feasible alternative for everyone, either. I
24 swam at Texas A&M my first two years of college before transferring to Tennessee. I realized
25 after two seasons that Texas A&M's training program was not well-suited to my needs as a
26 swimmer. Deciding to transfer, though, was an incredibly difficult decision. When I told my
27 teammates I was going to transfer, they all started to cry. I was scared that my new team wouldn't
28 accept me.

1 13. By entering the portal, I knew that I could lose my athletic scholarship at Texas
2 A&M. I knew that I would not likely get as much scholarship money at a new school—and that
3 was true. Tennessee offered me less money. But I was lucky that my parents were able to
4 support my move to attend Tennessee. When I transferred, I also had to switch majors to graduate
5 in four years since many of my Texas A&M credits did not transfer.

6 14. Not every student athlete that is cut from their team due to roster limits will have
7 the means to move to another school, even if they are able to find another roster spot. Some
8 student athletes who are cut because of roster limits will have to pay more tuition and will take
9 longer to graduate if all their credits do not transfer.

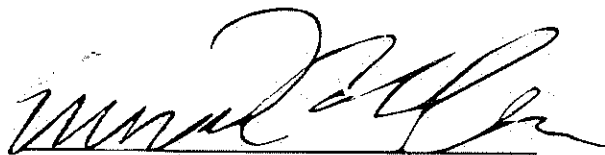
10 15. These roster limits will be a disaster. I believe that this settlement should not be
11 approved if they are included.

12 16. I also feel the need to speak up because my younger brother, Wyatt, is currently
13 a college athlete. He could be cut from his team. Even if he makes it through the initial cuts, I
14 am afraid that he will continue to feel immense pressure to keep his roster spot. And more than
15 one round of cuts seems likely at many programs.

16 17. If the roster limits are imposed, many student athletes will be impacted. Some
17 will be put in worse financial situations and be forced to move states, leave their friends, and
18 even delay their completion of college if they wish to continue playing their sport. They must
19 be removed from this settlement.

20 I declare under penalty of perjury that the foregoing is true and correct.

21 Oahu, Hawaii
22 January 26, 2025

23
24 

25 Emma Carlton
26 NCAA ECID No. 1508264796
27 Address

28 47-745 Kamehameha Hwy
Kaneohe, HI 96744

Wyatt Carlton
2705 River Vista Loop
Mount Vernon, WA 98273

January 4: , 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Wyatt Carlton. I am a current Division I athlete at the University of Tennessee and my NCAA ECID number is 2106197546. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Wyatt Carlton

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF WYATT CARLTON**

9 I, Wyatt Carlton, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a sophomore and member of the swim team at the University of Tennessee.
11 I am a member of the Injunctive Relief Settlement Class and object on behalf of the class.

12 2. Leading up to college, I was the 2023 3A WIAA State Champion in the 100 Fly
13 and runner up in the 200 Free. I earned All-American Consideration times and set the meet
14 record in at the District Championships, 2023. In 2022, I was the 3A WIAA State runner up in
15 the 100 fly and the 200 free. I currently hold the Pacific Northwest Record for the 100 Butterfly
16 in LCM (Long Course Meters) and ranked in the National Top 20 for boys by USA Swimming
17 in the 100 Butterfly and 200 Butterfly for the years 2021-2023. I also won the 2022 USA
18 Swimming Futures Championship in the 100 Fly in Santa Clara, California. I qualified for and
19 competed in the Summer and Winter Junior Nationals, finishing 11th in the country in August of
20 2023 in the 100 Butterfly.

21 3. I was first exposed to the world of collegiate swimming when I was just 11 years
22 old when I accompanied my older sister, who is also a swimmer, on some of her college visits.
23 I followed in my sister's footsteps and decided to swim competitively as well. She swam on
24 Tennessee's Division I Women's Swim and Dive Team. When it came time for my college
25 recruitment, I considered a number of colleges but found Tennessee to be the perfect fit.
26 Tennessee has always been my dream school, and receiving an acceptance email from them
27 during my junior year was an amazing feeling. Tennessee had the academic degree I was seeking
28 as well as the swim team I longed to be a part of.

1 4. I first heard about the settlement in this lawsuit last summer, before the start of
2 my sophomore season. There were lots of discussions about the roster limits among teammates,
3 but no official communications regarding the issue from the program. Then, halfway through
4 this season, our coach said they were being forced to cut the team down to 22 spots for men,
5 effective this spring. We were told that they already withdrew offers from some of the
6 committed high school seniors.

7 5. Next, I had a personal meeting with an assistant coach. He said there was a good
8 chance that I'll be cut as well, but that no decision has been made yet. This has been incredibly
9 stressful news to receive. While training in the pool 25+ hours a week and maintaining good
10 grades, I have been extremely nervous and scared about losing my spot on the team--a spot I was
11 promised to have with a scholarship for all four years. As college athletes, we are continually
12 pressured to perform at the highest level, but the roster limits issue has brought on a stress I never
13 thought possible. This news has also deeply affected the team culture, which had a family
14 dynamic before the looming threats of roster limits. We have one of the strongest teams in terms
15 of bonds among teammates that the school has ever had. The cuts that will need to be made
16 because of the roster limits will unfortunately end those bonds.

17 6. This situation is especially difficult for me as an underclassman, as I am still
18 developing as a swimmer. Our training is designed so that we hit our peak performance at the
19 end of the spring. That time to develop is critical as it gives developing swimmers like me the
20 chance to realize our potential. I suffered from an illness last summer, which prevented me from
21 training and caused significant weight loss. I have been putting in the work necessary to get
22 back into shape for competing, despite being sidelined due to a health issue. Although this has
23 not been easy, but I am happy to put in the work because of how passionate I am about
24 swimming.

25 7. Being cut from the team would also cause me to take on significant financial
26 burdens, most notably, the cost of additional benefits I receive as a Tennessee Student Athlete.
27 I receive a partial scholarship from Tennessee of between \$15,000 and \$20,000 a year. Although
28 I could have gone to a smaller program that would have offered me a full scholarship to attend

1 (at no cost to me or my family), I chose Tennessee because I was promised that I would be able
2 to swim here for four years, Tennessee has the academic program I was seeking, and it has the
3 most incredible coaches. Due to the roster limits, I am now at risk of losing my partial
4 scholarship as well as other benefits like healthcare, access to the athletic cafeteria for breakfast
5 and lunch, academic tutoring and class placement support, and the option of taking classes during
6 the summer and winter terms. These benefits provide almost \$25,000 in value that my parents
7 would need to pay if I stopped receiving them as a student athlete.

8 8. Entering the transfer portal would immediately put my scholarship and benefits
9 at risk. This puts me in a difficult spot. I really do not want to transfer because Tennessee has
10 been my dream school since a very young age, I am halfway through coursework completing the
11 field of study for my bachelor's degree and I feel extremely connected to my team and view
12 them like my own family. I have already signed an apartment lease for the school year, 2025-
13 2026, which I have with three other swimmers on the team. Thinking about transferring to
14 another school due to the financial hardship placed on my parents has become a nightmare to
15 imagine.

16 9. I am not the only one at my program who is disappointed with the cuts happening
17 because of roster limits. Our coaches, especially our head coach, Matt Kredich, want the team
18 to stay together if possible. The coaches believe in developmental progress. Certain swimmers,
19 like myself, have only just scratched the surface and have so much more potential to realize. The
20 coaches also want to honor the commitments they made to us when we signed our National
21 Letters of Intent. As a newly signed recruit, I remember being ecstatic when the coaches and
22 team told me about the tradition of all seniors signing the rafters after their final collegiate meet.
23 I was promised the opportunity to compete and get my name up in the rafters.

24 10. I think the roster limits are going to harm all collegiate athletics, and especially
25 the Olympic sports. Teams will not be able to accommodate developing student athletes. There
26 will be fewer overall Division I opportunities available for students like me. Being a student
27 athlete has been especially valuable for me because I have been able to work on communication
28 skills that are necessary for success in the workplace. These same opportunities will not be

1 available to countless developing student athletes if roster limits are forced on us.

2 I declare under penalty of perjury that the foregoing is true and correct.

3 Dated: Mount Vernon, Washington
4 January 28, 2025



Wyatt Carlton
NCAA ECID No. 2106197546
2705 River Vista Loop
Mount Vernon, WA 98273

Grace Chelberg
517 W. 4th Street
Shawano, WI 54166

January 17, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Grace Chelberg. I am a current Division I athlete at Liberty University and my NCAA ECID number is 2306935701. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Grace Chelberg

1 **UNITED STATES DISTRICT COURT**
2 **NORTHERN DISTRICT OF CALIFORNIA**
3 **OAKLAND DIVISION**

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF GRACE CHELBERG**

9 I, Grace Chelberg, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am an 18-year-old freshman and runner at Liberty University. I am a member
11 of the Injunctive Relief Settlement Class. I object individually and on behalf of the class.

12 2. I have been running since around fourth grade and started competing on the
13 middle school track team. I love running track and cross-country. My favorite distances are the
14 800 meter and 1600 meter races. Once I got to high school, I improved so much that I knew I
15 wanted to pursue running in college. I was on the varsity team running 10 races a season every
16 year in high school. My proudest accomplishment was placing eighth in the Wisconsin state
17 800-meter race, which was my first individual event.

18 3. I am a devout Christian and only intended to attend a Christian college. I knew
19 early on that all I wanted to do was run for Liberty University. In senior year, I filled out a
20 Liberty questionnaire to express my interest in running cross country and track and field. I knew
21 exactly what I wanted and didn't even try looking into other options. Fortunately, Coach Mark
22 Fairley reached out to me and offered me a spot on the cross country team. I was so excited that,
23 even though I wasn't offered any scholarships, I committed to Liberty in fall 2023.

24 4. I arrived on campus in August 2024 and joined the women's cross country
25 development team coached by Coach Fairley. There are 32 total runners on the entire cross
26 country team. The development team has 17 runners, nearly all freshmen or sophomores. Coach
27 Fairley told us that we would develop into top runners in two to three years, and get good enough
28 to run on the competition team. Because injuries can happen with some frequency, we are also

1 expected to work hard so we can sub in at competitions if needed.

2 5. My team quickly became my exclusive circle of friends. We are tight knit and
3 support each other in running, school, and life. Because I am a Liberty athlete, we live together
4 in team housing, eat together in the athlete cafeteria, and train together at the Liberty Athletic
5 Center. We also practice together every day (except Sundays), including captain-led long runs
6 on Saturdays.

7 6. As an athlete, I have access to other support services at Liberty. There are tutors,
8 advisors, and trainers who are available to help me balance the intense training schedule with
9 my coursework. Keeping up my grades in addition to racing is important to me because I want
10 to be an educator after college.

11 7. Then in mid-November, Coach Fairley told us that due to new NCAA roster
12 limits in the House v. NCAA settlement, he would have to cut **15 runners** from the women's
13 cross country team. He told us the roster limits were so strict, the athletic department couldn't
14 even move us around between cross country and track and field to keep us on the teams.

15 8. We were shocked. Fifteen cuts basically means the entire development team. We
16 are the least experienced runners on the team, so we all knew that it was likely all the cuts would
17 be made to our group.

18 9. I feel sad and frustrated at the near-certain prospect of being cut at the end of the
19 school year. I was promised four years of running for Liberty, and before I could even get my
20 feet under me, that promise was broken. I will be thrown out of team housing, lose access to all
21 the campus spaces that I have just managed to get comfortable with, and lose my friends.

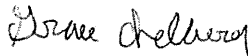
22 10. Transferring is not a realistic option for me. I knew for a long time that Liberty
23 was the only college I wanted to attend, and I never even considered going anywhere else. I also
24 don't want to add to the flood of women runners overwhelming the transfer portal. One of my
25 teammates has already entered the transfer portal, and many others I've spoken to are considering
26 it. I would feel even worse if I joined them, because even if I managed to land on another team,
27 I'd be sick and guilty about taking a spot from one of my teammates. I can't do that to my
28 friends.

1 11. I started the year hopeful for a new beginning. None of us knew our hopes were
2 false. I don't blame Coach Fairley. It isn't his fault. The settlement just has no regard for how
3 runners like me, who come to school to get better over time, are thrown away like none of us
4 matter.

5 12. I never expected to earn NIL money. I am paying my own way through school
6 because I want to run for the Liberty team so badly. It isn't fair that my dreams and expectations
7 have been shattered overnight for no good reason. I just want to keep what I was promised
8 almost 2 years ago.

9 I declare under penalty of perjury that the foregoing is true and correct.

10 Dated: Shawano, Wisconsin
11 January 17, 2025



Grace Chelberg³
NCAA ECID No. 2306935701
517 W 4th St.
Shawano, WI, 54166

Nicholas Ciocca
329 Lenape Drive
Berwyn, PA 19312

January 7, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Nicholas Ciocca. I am a current Division I athlete at the University of Notre Dame and my NCAA ECID number is 2102106239. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Nicholas Ciocca

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF NICHOLAS CIOCCA

9 I, Nicholas Ciocca, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a 19-year-old college freshman at the University of Notre Dame in Notre
11 Dame, Indiana. I play on the Division I golf team at Notre Dame and thus am a member of the
12 Injunctive Relief Class. I am writing to object to the inclusion of roster limits in the settlement
13 on behalf of the class.

14 2. In seventh grade, I fell in love with golf. I started spending all my time at the
15 golf course. I joined my school's golf team in middle school and began traveling to tournaments.
16 I knew very quickly that I wanted to play Division I golf in college, so I started reaching out to
17 college coaches during my freshman year of high school.

18 3. Many programs expressed interest in me playing on their teams. But when I
19 visited Notre Dame in February 2022, I fell in love with the place. I knew that it was the perfect
20 school for me. It had a great golf program, great academics, and it aligned with my Catholic
21 faith, which has always been important to me.

22 4. I verbally committed to Notre Dame to play on their Division I golf team in July
23 2022, and I signed my letter of intent on Signing Day in November 2023. I received a scholarship
24 to play on the team. I was so excited to begin my collegiate golf career and to matriculate at
25 Notre Dame.

26 5. Before starting at Notre Dame in August 2024, I developed a wrist injury.
27 Because of my injury, I had to sit out several tournaments in the fall of 2024, including Notre
28 Dame's home tournament. My injury also prevented me from playing to my full capabilities. I

1 have been working with a trainer to heal my injury, but I will still have to go undergo surgery
2 after the spring season.

3 6. In the fall, I knew that roster limits were looming, but I thought there was a good
4 chance a phase-in would be implemented. I did not think anyone—including me—would be cut
5 from the team this year. However, the way the settlement was progressing, it seemed like a
6 reality that this could happen way sooner than expected. As far as our team goes, we have three
7 incoming freshmen, which leaves two current players that will be cut. Our coaches told us that
8 they don't agree with the roster limits either, but that this was out of their hands.

9 7. My teammates and I wrote letters to the Commissioner of the Atlantic Coast
10 Conference to try and stop the conference from opting in to the settlement and enforcing roster
11 limits. I even wrote a research paper about why a phase-in for roster limits would make more
12 sense. Despite our efforts, Notre Dame and the ACC both have opted-in to the settlement.


13 8. In November, I found out that I would be cut from the team. I was shocked. If
14 the roster limits are included in the settlement, I will play the spring season at Notre Dame, but
15 next year I will no longer have a spot on the team, as well as my biggest support network at
16 school. I am especially disappointed because I have not been able to perform to the best of my
17 abilities so far because of my wrist injury.

18 9. The golf team at Notre Dame is incredibly close-knit. My best friends are my
19 teammates. It will be difficult to adjust to not only spending less time with my friends, but also
20 less time playing the sport I love. Additionally, it is not clear whether I will be able to continue
21 to access the athletic resources—like academic counseling and tutoring, or the team gym—next
22 year after being cut from the team. This will also be an adjustment.

23 10. All my teammates have expressed disappointment about the roster limits.
24 Throughout this year, we have built a great team culture with a lot of camaraderie. We work
25 hard and we have fun doing it. No one wants to see team members cut because of these arbitrary
26 roster limits.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Berwyn, Pennsylvania
January 7, 2025



Nicholas Ciocca
NCAA ECID No. 2102106239
329 Lenape Drive
Berwyn, PA 19312

Boden Clark
12303 98th Ave Ct NW
Gig Harbor, WA 98329

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Boden Clark. I am a current Division I athlete at Mercyhurst University and my NCAA ECID number is 2201410123. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Boden Clark

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF BODEN CLARK**

9 I, Boden Clark, hereby declare as follows pursuant to 28 U.S.C. §1746:

10 1. I am a Sophomore, Class of 2027, at Mercyhurst University and am a member
11 of the NCAA Division I Men's Lacrosse team. I am a member of the Injunctive Relief
12 Settlement Class and object both individually and on behalf of the class.

13 2. I have committed countless hours over the years to achieve the opportunity to
14 compete as a Division 1 college athlete. As a student-athlete, I have been dedicated myself to
15 rigorous training sessions and practices, 20-40 hours a week depending on the time of year. I
16 had to make a choice to forgo part-time employment, social events, high school experiences
17 and family vacations. My commitment required discipline and resilience which I made
18 willingly to pursue my dream to play lacrosse at a higher level.

19 3. My athletic achievements were recognized by coaches across the country,
20 amongst all divisions, and I received multiple college offers. I chose Mercyhurst University
21 because it was the right fit for me academically, athletically and socially.

22 4. The recruiting process was long and competitive. My coach promised me a spot
23 on his roster all four years, and the opportunity to compete for playing time based on my
24 attitude, skill and effort. I made the choice to turn down several other offers because I believed
in the vision for my future here, both as a student and an athlete.

1 5. I am deeply concerned about the impact of the proposed roster limits and
2 consider them unfair and inequitable. The proposed roster limits would mean our current team
3 of 63 players would be forcibly reduced to 48. This means 15 of my brothers would be cut,
4 possibly including myself. My knee was seriously injured during practice a few months ago
5 which required an extensive surgery and 10-12 months of rehabilitation. I am on medical
6 redshirt status until I am able to return to the field. While I have been working hard to recover,
7 and remain engaged daily with the team, this roster reduction threatens my future as a
8 student-athlete. In fact, the roster limit incentivises coaches to let go of any injured players,
9 thus essentially ending their athletic careers.

10 6. My coach says the administration at Mercyhurst University is still unsure if they
11 will opt-out of the proposed settlement. The looming uncertainty is taking a heavy mental toll
12 on myself and teammates. The mental requirements of being a student-athlete are already
13 demanding, and the added stress of potentially losing my position has exacerbated these
14 challenges as well as complicated my recovery. The thought of potentially being cut, because I
15 am injured, and cannot compete to retain my position, is affecting my daily well-being.

16 7. If I am cut, as a result of the proposed roster limits, I will lose much more than
17 just my position as a player. I will lose the camaraderie and sense of belonging that being part
18 of the team provides. The friendships I have built over the years have become an integral part
19 of my college experience, and being part of the team has helped shape my identity and purpose
20 as a student-athlete. Additionally, the team benefits extend to networking and expanded career
21 opportunities. Thus roster limits have the potential of a lifelong negative impact.

22 8. As a result of the proposed roster limits, I am left with considerable uncertainty
23 and anxiety about whether or not I will be able to continue competing for my university, have
24 to transfer or will be forced to stop playing collegiate sports completely. This all affects my

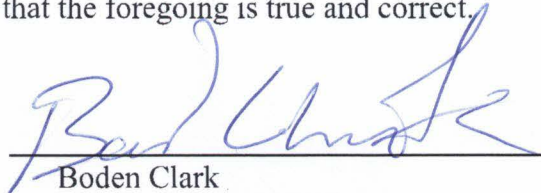
1 ability to afford tuition and graduate on time. The intent of the student-athlete path is to assist
2 and enrich the college experience not hinder or derail one's future.

3 9. I respectfully ask the court to consider the human impact of these roster limits
4 and all the complexities this entails. Revenue sports should not, and cannot, be the only
5 priority of the NCAA. I hope the court will recognize the deep, lasting impact these cuts will
6 have on me and my teammates, and all athletes affected, and that a fair solution can be found
7 that allows us to continue pursuing our dreams as student-athletes.

8 I declare under penalty of perjury that the foregoing is true and correct.

9 Dated: Erie, PA

10 January 26, 2025


Boden Clark

NCAA ECID No. 2201410123

12 12303 98th Ave Ct NW
13 Gig Harbor, WA 98329

Kayla Coates-Robertson
8321 172nd Ave NE
Redmond, WA 98052

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Kayla Coates-Robertson. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 2309118129. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Kayla Coates-Robertson

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF KAYLA COATES-ROBERTSON**

9 I, Kayla Coates-Robertson, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a Freshman at the University of Washington and a member of the NCAA
11 Division I Women's Rowing team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 2. Although I have no regrets, I would like to highlight that on the path to becoming
14 a Division I college athlete I went from running a club at my middle school to dedicating my
15 extracurricular time almost solely to rowing in high school. While my peers gained part time
16 job experience, leisurely spring breaks, and benefited from hours of time to study after school
17 each day, I was rowing. I missed friends' birthday parties and family vacations. To be successful
18 in rowing you can't miss practice. Your success is dependent on your whole boat being fast,
19 meaning not only do you have to buy in, but you have to inspire others to buy in. Any
20 relationship that doesn't have to do with rowing has to be very strong to withstand the level of
21 dedication required to rowing and rowing only.

22 3. In my high school rowing career, I qualified for Youth Nationals three times, for
23 the women's 2V 8 sophomore year, and the Varsity 8 my junior and senior year. I won my
24 club's indoor 2k erg race my junior year and I was my club's fastest erg time for the class of
25 2024. At Northwest Regionals I placed 2nd in the 2V 8 my sophomore year, 2nd in the Varsity
26 4- and 3rd in the Varsity 8 my junior year, and 3rd in the Varsity 4- and 2nd in the Varsity 8 my
27 senior year. This year I hope to compete at Big 10's in a novice 8.

28 4. Fall of my senior year my mom and I flew multiple times so that I could meet

1 coaches, see schools, and interact with what my potential future teams could be. One of the
2 things I valued the most was rowing somewhere I would be able to compete and grow over time.
3 I wanted role models to look up to like I had in high school. The University of Washington told
4 me the first time I talked to them that I should only consider their school if I was ok with spending
5 my first few months rowing with people who had never rowed before. As someone who started
6 rowing after COVID and consequently had a very large novice class in high school, this was a
7 positive. There are few things more inspiring than watching people discover and develop a love
8 for the sport that has changed your life.

9 5. During recruitment I shared my love for racing and explained that in college I
10 wanted to continue to improve my individual scores and race at the collegiate level. Imagine my
11 disappointment when Coach Yasmine Farooq (Coach Yaz) shared with us that we will not be
12 able to race until our roster is capped on December 1, sacrificing our entire fall racing schedule.

13 6. I learned about roster limits the evening of January 17, 2025 from our head Coach
14 Yaz. She sat us down and walked us through how the settlement in the *House v. NCAA* case will
15 implement a 68 person roster cap. With a freshman class of 40 athletes, we were well aware that
16 the UW women's rowing team thrives off of a large roster size and time spent cultivating athletes
17 from a wide range of initial skill levels. She stressed to us that our coaching staff would be doing
18 their best to give each of us our best shot at making that 68-person cap by sacrificing our fall
19 racing season, giving all of us chances to find new speed before the cap was finalized on
20 December 1, 2025. On a team of nearly 100 athletes, that means saying goodbye to 32% of our
21 team.

22 7. With the impending 68 person cap, I am incredibly stressed about my chances,
23 and my friends' chances, of making the team next year. In our sophomore year, we will no
24 longer just be competing against novice rowers for boating. Instead, our competition becomes
25 our fellow teammates who are Olympians, record holders, and truly incredible athletes. As a
26 young woman even with years of experience in rowing behind me, proving to myself that I am
27 a competitive athlete is a continuous struggle. In a sport that requires not only physical strength
28 but also the mental strength to force the body to exert itself beyond the point where our minds

1 tell us to quit, the added competition of a 32% decrease in team size is a significant hinderance.
2 Every day I weigh time spent sleeping, versus training, studying, eating, or socializing. Now I
3 run these equations twice as often, with four times as much anxiety. How do I get optimal
4 performance? How do I waste less time? I want to focus on my love for this sport, not exacting
5 the optimization of my time for it.

6 8. I started rowing my sophomore year of high school and I never looked back.
7 Rowing has provided me stability and self confidence in the most turbulent years of child and
8 young adulthood. People tell young women all the time that they are strong, but there are not
9 very many chances the world creates for them to prove it to themselves in a safe and uplifting
10 environment. The people I plan to live with next year are rowers, many of my close friends and
11 support systems are past or present teammates. I can take economics classes and feel confident
12 of my success because of individualized athletic tutoring, and I have access to high quality food
13 via athlete dining. The most immeasurable benefit, however, is the aid the rowing community
14 provided me transitioning from high school to college, which I pray I will continue to benefit
15 from in the coming years.

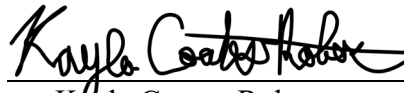
16 9. Because of roster limits I must consider a future that might not include rowing. I
17 do not want to transfer. My family is a 20-minute drive away, and I chose the University of
18 Washington for its impressive facilities and on campus boathouse. The way I live is intertwined
19 with my love for rowing. My practice schedule has helped me manage my time, but the sport
20 has helped me manage my life. Because of rowing I know how to self-motivate, how to be
21 friends and be successful with people who are very different from me, and how it feels to dedicate
22 yourself wholly to a cause dependent on the cooperation of many.

23 10. Protecting women's sports is not a new fight, but we should be moving forwards,
24 not backwards. While I am sympathetic to the athletes searching for monetary compensation,
25 what about the hundreds of women past and present and potentially future who gain things far
26 more valuable than money from women's rowing? Our team's success and culture come from
27 its ability to empower people starting from all different skill levels and showing them that the
28 sky is the limit. While joining UW's women's rowing team is a potential path to the Olympics,

1 it is more importantly a certain path to self-confidence. Don't allow the colligate sporting world
2 to be one for only male athletes and money. This roster cap will ruin the spirit of something I
3 and my teammates value above almost everything.

4 I declare under penalty of perjury that the foregoing is true and correct.

5 Dated: Seattle, Washington
6 January 26, 2025



Kayla Coates-Robertson
NCAA ECID No. 2309118129
8321 172nd Ave NE
Redmond, WA 98052

Greyson Connor
1529 Ideal Way
Charlotte, NC. 28203

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Greyson Connor. I am a high school student aspiring to be a future Division I athlete, and a member of the Injunctive Relief Class. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,

A handwritten signature in blue ink that reads "Greyson Connor". The signature is written in a cursive, slightly slanted style.

Greyson Connor

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

7
8 **DECLARATION OF GREYSON CONNOR**

9 I, Greyson Connor, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am 15 years old and am in 9th grade at Charlotte Latin School in Charlotte,
11 North Carolina. I have been a competitive swimmer since I was 9 years old and hope to compete
12 on a Division I college team.

13 2. I understand that the settlement in this lawsuit will govern NCAA Division I
14 sports for the next decade, which is when I will be in college. I therefore am a class member
15 who could be affected by the terms of the settlement. I object to the settlement for the reasons
16 stated below, both for myself and for other class members like me.

17 3. I currently practice 6 days a week in and out of the pool for 2-3 hours per day for
18 49 weeks out of the year. I compete for a club team that trains and competes 12 months out of
19 the year and also for my high school team that competes in the winter. My two teams have swim
20 meets 1-2 times per month, which means I am often swimming 7 days per week. I love the sport
21 of swimming and want to have the opportunity to continue my swimming career in college.
22 Because of my dedication to practice and meets, I sometimes have to miss school, social events,
23 football games, and other activities my classmates are able to enjoy.

24 4. I first started swimming when I was 5 on a summer league swim team before I
25 starting swimming competitively at 9 years old. At 10 years of age, I qualified for my first Age
26 Group State Championship. Since then, I have continued to qualify for the state championship
27 meet each year, as well as a regional sectional meet called Southern Premier since I was 12.

28 5. I have learned many lessons from swimming. To be successful requires hard

1

DECLARATION OF GREYSON CONNOR
CASE NO. 4:20-CV-03919-CW

1 work and dedication, as well time management. I have become a better student from these
2 lessons because I cannot afford to procrastinate and must be efficient with my limited free time
3 after swim practice. My father was on the swim team at the University of North Carolina at
4 Chapel Hill, and my sister has committed to swim for Georgetown University this fall. I hope
5 to have the opportunity to follow in their footsteps.

6 6. I believe that college sports teams should not have roster limits imposed because
7 it will reduce the number of opportunities for athletes to play the sport they love at the college
8 level. I have seen how hard my sister has worked over the years to be eligible to swim in Division
9 I, and it would be devastating for her hard-earned spot to be in jeopardy in the future due to
10 roster limits. Student-athletes work tirelessly for many years and are dedicated to their sport and
11 education. Playing a sport creates lifelong friendships, encourages teamwork, promotes
12 leadership, and teaches perseverance after disappointment and other life lessons. Athletes like
13 my sister and me just want the chance to continue our athletic careers.

14 7. The percentage of high school athletes who continue to play their sport in college
15 is already extremely small. To impose roster limits would further reduce the dream of many
16 high school athletes. Thank you for your consideration of athletes who just want to play the
17 sport they love for their college.

18 I declare under penalty of perjury that the foregoing is true and correct.

19 Dated: Charlotte, North Carolina
20 January 26, 2025



Greyson Connor
1529 Ideal Way
Charlotte, NC 28203

Lila Connor
1529 Ideal Way
Charlotte, NC. 28203

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Lila Connor. I am a high school student committed to be a Division I athlete, and a member of the Injunctive Relief Class. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,



Lila Connor

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF LILA CONNOR**

9 I, Lila Connor, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am 18 years old and am in 12th grade at Charlotte Latin School in Charlotte,
11 North Carolina. I have been competing as a swimmer since I was 11 years old and have
12 committed to compete at Georgetown University this fall.

13 2. I understand that the settlement in this lawsuit will govern NCAA Division I
14 sports for the next decade, which is when I will be in college. I therefore am a class member
15 who could be affected by the terms of the settlement. I object to the settlement for the reasons
16 stated below, both for myself and for other class members like me.

17 3. I practice for 3 hours Monday through Saturday during the school year. During
18 the summer and over school breaks, the training increases to 5 hours per day. Swim meets occur
19 at least twice a month over 3 days with morning preliminaries and evening finals sessions lasting
20 3-4 hours each. I train 49 weeks out of the year. I love the sport, as it challenges me in different
21 ways than in the classroom. With swimming, I found an endless drive for more. Once a goal or
22 a best time is achieved, there is always a new goal. I have made sacrifices for swimming
23 including deciding between sleep and homework during very limited free time after practice.
24 I've had to miss school for meets, and it is challenging to make up the work and missed
25 instruction time. I have also missed school and social events such as football games and dances
26 due to swim meets.

27 4. I first qualified for the Age Group State Championship swim meet when I was 12
28 years old. Since then, I have qualified for swim meets at the regional and national levels,

1 including Futures Championships and Winter Junior National Championships. While competing
2 for my varsity school swim meet, I have won state championships in both individual and relay
3 events and named Most Valuable Player for the most points scored.

4 5. My father swam for the University of North Carolina at Chapel Hill and inspired
5 me to swim. I thrive in a structured schedule, and swimming requires a lot of scheduling and
6 time management, which forces me to be efficient. Through swimming, I'm able to strengthen
7 my body and mind because the sport is mental in addition to physical.

8 6. I believe that Division I athletic teams should not have roster limits imposed
9 because of how much harder it will be to compete for a spot on a collegiate team. If my spot at
10 Georgetown was cut due to roster limits, I would be devastated. I signed my Letter of Intent to
11 swim at Georgetown on April 8, 2024, and I have been looking forward to swimming with the
12 team every day since then. However, with this ruling, my spot could be cut before I even have
13 my first practice as a Georgetown swimmer. Additionally, my younger sister is a freshman in
14 high school and hopes to swim at the collegiate level. With this roster limit, it will be
15 substantially harder for her to find a school and team that is the right match for her and has spaces
16 available. It is possible that my sister may not get the same opportunities that I had during the
17 recruitment process due to this ruling. Younger swimmers across the country should not be
18 forced to stop competing at such a high level because schools that would have been an option
19 for them a year ago, suddenly have to be much more selective.

20 7. Thank you for your consideration of the effect roster limits will have on student
21 athletes. Roster limits will crush so many athletes' hopes of competing at the Division I level
22 and must not be imposed.

23 I declare under penalty of perjury that the foregoing is true and correct.

24 Dated: Charlotte, North Carolina
25 January 26, 2025

26 
27 Lila Connor
28 1529 Ideal Way
Charlotte, NC. 28023

Kaitlyn Conover-Emmert
2549 Fairbrook Dr
Mountain View, CA 94040

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Kaitlyn Conover-Emmert. I am a current Division I athlete at the College of William & Mary and my NCAA ECID number is 2304846881. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Kaitlyn Conover-Emmert

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF KAITLYN CONOVER-EMMERT

I, Kaitlyn Conover-Emmert, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a sophomore at the College of William & Mary and a member of the NCAA Division I Women's Swim Team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. Our coaches have explained to us that roster limits, if implemented, will cause our team to incur and suffer from cuts of four of our teammates. We do not yet know if these will be athletes currently on our team, incoming freshmen, or a combination. We do not want this and feel we should not have to worry about losing teammates or have any concerns surrounding our own position on the team. Added stress does not help performance or team spirit. Nor will a limited roster benefit our team.

3. We function as a team in and out of the pool. We eat together, study together, relax together, and live together; we have strong mentoring systems on our team and pride ourselves on helping one another in and out of the pool; we are a tight, supportive group. We worked incredibly hard throughout high school in order to have this opportunity; we all want to remain on this team and at our school, together. We do not feel roster limits help our team or our sport, but they will negatively impact those who are cut and our team at large.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Williamsburg, VA

January 28, 2025

Signed by:

Kaitlyn Conover-Emmert

24CAD82B3A7D4BF...

Kaitlyn Conover-Emmert

NCAA ECID No. 2304846881

2549 Fairbrook Dr

Mountain View, CA 94040

Mina Cook
3516 NE 96th Street
Seattle, WA 98115

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Mina Cook. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 2209659266. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Mina Cook

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF MINA COOK**

9 I, Mina Cook, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman at the University of Washington and am a member of the NCAA
11 Division I women's rowing team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 2. This past year has been my first year of competing as a college athlete. So far it
14 has been one of the most rewarding yet demanding things I have ever done. I first started rowing
15 when I was in eighth grade. In the five years between starting my sport and becoming a Division I
16 athlete I spent countless hours dedicated to my sport. I have been training 6 days a week, every
17 week since I was twelve years old. This dedication of time to my sport meant making numerous
18 sacrifices. Because of my sport I was not able to experience many key high school experiences,
19 such as going to a school dance or walking at graduation. This is just a small portion of what I
20 missed out on in my pursuit of Division I athletics. However, the dream of competing and my
21 passion for the sport made all the sacrifices worthwhile.

22 3. Most young rowers in Seattle dream of rowing for the University of Washington
23 at some point in their careers, and I was no different. After learning of the deep history of the
24 rowing program at Washington, and hearing of the many stories of excellence, I began imagining
25 what it would be like to represent Washington as an athlete. I remember as a freshman in high
26 school, watching in awe as the fleet of UW boats rowed past me, each athlete and crew perfectly
27 in sync navigating the glassy waters of Lake Union. That is when I knew I wanted to be a Husky,
28 and from that moment on I worked tirelessly to try and make this achieve this goal.

1 4. During my junior year of high school, after three years of work, I was finally fast
2 enough to catch the attention of the coaches at Washington and was invited to watch a practice.
3 I don't think I slept the night before my visit, the mix of excitement and nerves making it feel
4 impossible. During my visit I watched the athletes complete a twenty-kilometer row on the
5 rowing machine. Looking out at the rows upon rows of athletes, I saw that there was power in
6 the size of the team, and that the scale brought a mightiness and an impressive comradery to the
7 group. I signed my commitment letter a few weeks later. In that letter I was promised a spot on
8 the team as long as I hit some athletic benchmarks; something that I knew was possible as long
9 as I applied myself fully.

10 5. In the months leading up to the start of the school year, and throughout the past
11 few months at school, I have been working hard to set myself up to hit those benchmarks.
12 However, after learning about the newly proposed roster limits my efforts feel aimless.
13 Development in rowing takes time, and with the proposed roster cuts, I and many other athletes
14 will not have time to develop in order to compete for a spot on the team. This development time
15 impacts current and incoming freshmen the most. With the proposed roster cut day, most of us
16 will stand no chance against the older athletes. This is not only damaging to us as individuals,
17 but it also threatens the future of our sport. This has been an incredibly difficult reality for me
18 and my peers to accept.

19 6. Losing a spot on this team would be detrimental to my mental and physical well-
20 being. I have only been on the team for a few months, but it has quickly become like a second
21 family to me. All of my closest friends are on the team, and I can't imagine losing the time I have
22 with them. Not only would I lose my community, but I would also lose benefits that the team
23 brings, such as food, academic resources, and medical coverage. This would make things more
24 difficult for me and would greatly increase costs of going to school.

25 7. If cut, I would be forced to make a very difficult choice. I can enter the transfer
26 portal and get to continue to pursue my passion, but I will have to move away from all of my
27 friends and family, as well as pay for out of state tuition, something that my family cannot afford.
28 Or, I stay at my school and keep my community, but I lose what has been the biggest part of my

1 life for the past six years. I deeply hope that I will not be forced to make that decision.

2 I declare under penalty of perjury that the foregoing is true and correct.

3 Dated: Seattle, Washington



4 January 26, 2025

5 Mina Cook
6 NCAA ECID No. 2209659266
7 3516 NE 96th Street
8 Seattle, WA 98115

Griffin Craig
24328 Philson Farm Road,
Bartlesville, OK 74006

January 27, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Griffin Craig. I am a current Division I athlete at the University of Missouri and my NCAA ECID number is 2207616892. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Griffin Craig

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF GRIFFIN CRAIG

I, Griffin Craig, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a student-athlete at the University of Missouri and a member of the NCAA Division I men's swim team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. I object to the roster limits proposed in the *House v. NCAA* settlement. These roster limits are unfair for the student athletes that are currently participating in college sports.

3. I am afraid of being one of one of the athletes affected by these roster limits. It will be very hard on my family, because for me to remain at the University of Missouri, my family would have to the cost of out-of-state tuition. I was recruited by the University of Missouri over 2 years ago. I may not have committed to this out-of-state cost had I known that roster limits could risk my spot on the team.

4. There are also hundreds of benefits that I, along with many other college athletes at risk of being cut, would lose if we are cut. They include athletic services such as meals, clothing, housing, and academic support. There are so many athletes that rely on their athletics to pay for these things in college along with the cost of school, and losing this opportunity would financially hurt them and their families.

5. The transfer portal is no solution. It is too late for athletes to enter the transfer portal and find a spot on another team. At the same time, it is cost prohibitive for many to remain where they currently are without scholarships that they could lose if cut.

6. Roster limits will not only have a huge financial impact on thousands of college

1 athletes, they will also cause significant emotional and mental health issues. For me, my team
2 has become like a second family, and the thought of losing them has a significant impact on my
3 mental health. I rely on my teammates to get me through my days of school, long practices, and
4 being homesick. I know I am not the only athlete who feels this way.

5 7. It is imperative that the Court reject the roster limits in the settlement and consider
6 the thousands of student athletes that will be affected financially and emotionally by these roster
7 limits. At minimum, I ask the Court to please allow me and all affected athletes to be
8 “grandfathered in” without being cut due to roster limitations that were not in place when I was
9 recruited to swim for the University of Missouri.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Dated: Columbia, Missouri
12 January 26, 2025

Signed by:

Griffin Craig

7071AAC0EB0C48C...

Griffin Craig

NCAA ECID No. 2207616892

24328 Philson Farm Road,

Bartlesville, OK 74006

Audrey Cronin
4330 Little Canoe Channel Ne,
McCarty Hall, Rm 314,
Seattle, WA 98195

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Audrey Cronin. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 2206584208. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Audrey Cronin

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4
5 IN RE COLLEGIATE ATHLETE NIL
6 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

7
8
9 **DECLARATION OF AUDREY CRONIN**

10 I, Audrey Cronin, hereby declare as follows pursuant to 28 U.S.C. §1746:

11 1. I am a freshman at the University of Washington and am a member of the NCAA
12 Division I women's rowing team. I am a member of the Injunctive Relief Settlement Class and
13 object both individually and on behalf of the class.
14

15 2. Before rowing at the University of Washington, I started rowing as a high school
16 freshman at St. Andrew Rowing Club in 2020. I remember my novice year being incredibly
17 challenging and grueling. I came into the sport at 5'6", 190 lbs, with minimal athletic experience.
18 I was one of the slowest kids on the team. I lacked the power and endurance to be able to pull
19 my weight in the boat. Through steady progress and perfect attendance at practice, I earned the
20 opportunity to seatrace for the U17 Youth Nationals pair but ended up losing my seatrace by
21 over 15 seconds. I knew this meant that the rest of my high school years were going to require
22 sacrifices if I wanted to be successful in this sport. So I started following in the footsteps of my
23 teammates who were in the 1V and 2V8s. I was doing extra ergs, changed my diet, and created
24 an erg spreadsheet with goals for every workout. I started beating people who were taller and
25 more powerful than me on erg workouts. Practices were 6 days a week for 3 hours a day. Every
26 single Saturday morning I would do a threshold workout before practice, practice on the water,
27
28

1 and come back to lift, totaling around 5 hours of practice. In my sophomore year, I won the St.
2 Andrew Women's Most Improved Varsity award, and in my junior year, I broke the St. Andrew
3 Rowing Club Lightweight women's 2k record pulling 7:29.3 at 134 lbs. I've medaled at Youth
4 Nationals 3 times: 3rd in 2022, 3rd in 2023, and in my senior year, I won a USRowing Youth
5 National Championship in the Women's 4+ by over 6 seconds.
6

7 3. At 5'7" and 135 lbs in my junior year, I had a difficult time proving my speed in
8 open-weight recruiting. Some of my top schools, like Penn, Princeton, or UMichigan, liked my
9 race results but didn't consider me a top recruit because of my height and raw erg scores. Luckily
10 for me, I was able to begin talking with the University of Washington because of a former
11 coxswain on my team, Olivia Murdock, who saw my potential as an athlete and recommended
12 me to the UW coaching staff. At the time of this recommendation, I had a 7:41 2k and my best
13 race result was a 3rd place medal in the Women's Youth 4+. From this point on, I continued to
14 update Coach Sam, the recruiting coordinator, with my new PRs and race results, and by the fall
15 of my senior year, I knew that Washington was the right place for me because I kept in
16 conversation with them before I had any solid erg scores or race results. I was recruited for my
17 work ethic and who I was as an athlete and not simply for my metrics and if I am no longer on
18 this team next year I will struggle to find a program that follows that outlook when recruiting.
19
20

21 4. I was recently informed of the roster cut during a team meeting and I knew what
22 it meant for athletes who are still developing. The journey I experienced in high school opened
23 my eyes to the process of athlete development. If I had been cut from my high school team based
24 on my height and erg scores by the beginning of my sophomore year, I never would have won
25 Nationals my senior year. Athleticism is so much more than what means the eye and athletes
26 like myself require time to reach their potential. Whether physically or mentally, I believe that
27 given the right atmosphere, anyone can create a legacy and be successful in the sport of rowing.
28

1 I declare under penalty of perjury that the foregoing is true and correct.

2
3 Dated: Seattle, WA

4 January 26, 2025



Audrey Cronin
NCAA ECID No. 2206584208
4330 Little Canoe Channel Ne,
McCarty Hall, Rm 314,
Seattle, WA 98195

Emma Cronin
McCarty Hall, Room 219
4330 Little Canoe Channel NE
Seattle, WA 98195

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Emma Cronin. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 2206590624. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Emma Cronin

1 **UNITED STATES DISTRICT COURT**
2 **NORTHERN DISTRICT OF CALIFORNIA**
3 **OAKLAND DIVISION**

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

7 **DECLARATION OF EMMA CRONIN**

8 I, Emma Cronin, hereby declare as follows pursuant to 28 U.S.C. §1746:

9 I am a first year at the University of Washington and am a member of the NCAA
10 Division I women's rowing team. I am a member of the Injunctive Relief Settlement Class and
11 object both individually and on behalf of the class.

12 Prior to rowing at the University of Washington, I spent my 4 years in high school
13 rowing at the youth level. I had practices every day of the week except for Sundays; the typical
14 weekday practice would last 3 hours while Saturdays typically extended to 5 hours. These
15 practices consisted of erging, rowing, body circuits, strength training etc. I pushed my physical
16 limits, there were pieces I barely finished and times where I pulled erg scores I didn't know
17 were ever going to be possible. Emotional, physical, and social sacrifices were involved, but
18 my goals were clear: I wanted to improve my athletic ability and row at the collegiate level.
19 With this experience I had one major takeaway: rowing is a sport in which it takes time to
20 develop, grow, and succeed, regardless of the individual's prior experience.

21 For me, becoming an athlete proved to be no easy task. Before picking up rowing in
22 high school at Saint Andrew Rowing Club, I was an extremely unathletic and unmotivated
23 individual. I had participated in sports throughout elementary and middle school, but I never
24 had enough accountability to continually play one. I remember telling my parents to

1 purposefully come late to swim practice so we could skip running sprints before getting in the
2 pool. Instead, I spent the majority of my hours on my computer, playing video games and
3 watching online content. These habits were worsened by COVID, I began to isolate myself
4 from my friends and neglect my physical and emotional health. As a result, I was diagnosed as
5 obese by doctors and weighed 210 lbs as a freshman in high school. Additionally, I had no
6 more friends to talk to: I felt alone. Something had to be done to turn my life around, to prove I
7 could be more than who I was becoming.

8 Rowing became my chance, my opportunity to prove I could be capable of something
9 bigger than myself: a team. However, it took me a long time to acquire any success. In my first
10 year of rowing, despite attending every single practice, I had the worst weight-adjusted 2000m
11 erg score on the team. This meant that on the water, I would have been beaten by every single
12 person on the team, some of whom had joined the team weeks before the test. Statistics showed
13 that I produced “negative wattage” for my weight, meaning if I had been pushing as hard as I
14 possibly could for a 2000m race, I would have slowed down the speed of the boat. I can
15 guarantee that if my youth rowing club had a roster cut or cap, I would be cut for a lack of
16 athletic ability and potential.

17 Thankfully I was given the opportunity to grow, develop, and improve. I made intense
18 sacrifices, including coming to the boathouse at 5am on Saturday mornings to log extra meters,
19 staying after practice to finish strength training, or constantly asking my coach technical
20 questions to improve my technique. Even if this meant I had less time to play video games or
21 attend social events, every practice felt worth it. I saw myself transform, both physically and
22 mentally. Once I had a taste of what it felt like to do something hard, I never wanted to look
23 back. In my junior year, I made the firm decision that I wanted to pursue a higher level of
24 rowing in college.

1 Towards the end of my high school career is when I saw the most amount of success.
2 At the end of my sophomore year, I earned a bronze medal at the USRowing Youth National
3 Championships in the Women's U17 4+. In my junior year, I won another bronze medal in the
4 Women's Youth 4+ event. Finally, in my senior year, my team and I won a national
5 championship, winning the Women's Youth 4+ event by over 6 seconds and earning my club
6 team its first national championship in club history. Additionally, I won a team award titled,
7 "The Spirit of Saint Andrew," in recognition of my work ethic, effort, and ability to be a
8 trustworthy teammate. The title is awarded to the athlete that best exemplifies the "spirit" of
9 what it means to be a rower on the team. This proved that my gains were not just physical, but
10 I had become a better person and human being over the course of my rowing journey. I would
11 not trade the friendships I made and life lessons I learned regarding empathy, accountability,
12 and leadership for anything.

13 Had I not continued to row in high school, had I been cut for the rower I was in my
14 freshman or sophomore year, I would have never been able to win a national championship. I
15 would have never felt the pride of starting from ground zero and working toward success.

16 Not only do I want to continue to grow and flourish as an athlete in college, but I dream
17 of sharing this experience with my friends and teammates on the UW women's rowing team.
18 My closest friends, and my current roommate are walk-ons, they have zero or very little rowing
19 experience. The current proposed roster cut would be detrimental for anyone who needs time to
20 develop before flourishing in the sport of rowing. It would be a tragedy to close the door on
21 the dozens of current rowers who are pushing their limits to be the best athletes they can be; it
22 takes time to learn the proper technique and gain boatspeed. I do not want to imagine where I
23 would be if I had not gotten the chance to continue rowing in high school: a very similar story
24 can be told about collegiate rowing. I can not imagine the athletes in the sport of rowing would


1 undoubtedly lose if coaches were forced to make a short-term decision about the future of their
2 athletes.

3 I heard about the roster cuts from my head coach, Yasmin Farroq. She informed us that
4 a large number of the team would be cut on December 1st, 2025 in order to achieve a roster
5 count of 68 athletes. There is no doubt that whether or not I am on this list, it will put strain on
6 my relationships with friends. There would be no more time training and rowing together at
7 practice, studying in the athletic academic building, or eating meals together in the dining hall.
8 Furthermore, if I were to be cut, I would inevitably be joining the transfer portal. As an
9 out-of-state athlete, my family depends on my opportunity to earn a scholarship, the financial
10 burden would be too much to support my twin sister and I for all four years of college with no
11 athletic benefits. Even without a scholarship, some benefits include free meals and snacks as an
12 athlete, priority spots when selecting classes, and the dozens of staff and faculty that can assist
13 athletes academically, physically, and mentally.

14 I personally plead for an extension of the rowing roster limit, collegiate athletes deserve
15 the time to achieve their full potential.

16 I declare under penalty of perjury that the foregoing is true and correct.

17 Dated: Seattle, Washington
18 January 26, 2025



NCAA ECID No. 2206590624
Room 219, McCarty Hall
4330 Little Canoe Channel NE
Seattle, Washington 98195

Trey Cunneen
10416 Donoho Pl,
St. Louis, MO 63131

January 24, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Trey Cunneen. I am a current Division I athlete at the University of Missouri and my NCAA ECID number is 2101996651. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Trey Cunneen

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF TREY CUNNEEN

I, Trey Cunneen, hereby declare as follows pursuant to 28 U.S.C. §1746:

1. I am a freshman at the University of Missouri (Mizzou), where I am a swimmer on the Division I swim and dive team. I am a member of the Injunctive Relief Class, and I object individually and on behalf of the class.

2. Going into high school, I was not the strongest swimmer. However, I was consistent in my work and dedication and proceeded to get stronger. My sophomore year I went 15:53 and 9:26 in the mile and 1,000-meter respectively, which allowed me to get recruited to many strong schools.

3. Being from Missouri, it had been a dream of mine to swim at Mizzou since I was about 8 years old and attended a swimming camp there. When Coach Andrew Sansoucie first emailed me, I was ecstatic. As I visited schools, I decided that Mizzou was the best fit for me. I committed to knowing that I was outside of Southeastern Conference (SEC) scoring range and would likely have to fight each year for a roster spot.

4. Unfortunately, my junior and senior year of high school were filled with setbacks due to illness and injury. This led to one of the hardest moments of my life. On November 7, 2023, the day before national signing day, I received a call from Coach Andrew Grevers at Mizzou. He said that while he was more than excited to have me on the team next

1 year, it would be as a preferred walk-on. In essence, my scholarship offer had been rescinded.

2 5. I could have accepted a scholarship offer at another school. But that was never
3 an option for me. I knew that Mizzou was my home, and where I wanted to swim. So even
4 though I had no athletic financial aid, I committed to Mizzou.

5 6. Fast forward to March of 2024. After another spring plagued by injury, I
6 decided to skip my senior summer and go to Mizzou early to train with the team. On June 1,
7 2024, I arrived at Mizzou, put my head down, and got to work. I lived in an apartment with 3
8 complete strangers, 10 minutes away from the rest of the team, and 15 minutes away from the
9 pool, because I was committed to improve my swimming. I spent most of my days that
10 summer swim training or spending time alone in my apartment because it was incredibly
11 important that I apply myself and prove that I deserved to be there.

12 7. Things got better, and by the time fall came, I was sure I was ready for a
13 monster freshman year. Unfortunately, the first two months of my freshman year were also
14 plagued with injury and illness, including a concussion and pneumonia. Still, my coaches and
15 I feel like I have made significant progress. While I do not know what the end of the year
16 looks like, I am confident that I am a better swimmer this year because of the training I
17 received at Mizzou.

18 8. I oppose the roster cuts because Mizzou and the SEC made a commitment to us
19 when we joined. If you asked every single swimmer on signing day how long they planned to
20 stay at the school they were signing to, almost every single one would say four years. There
21 was never a thought in my mind that I was committing to Mizzou for anything less than all
22 four years. I doubt that I would have been recruited here had I told the coaches that I was only
23 in for a year. Similarly, every single member of the class of 2028 committed to their SEC
24 school with the intention of swimming there for four years. Had I known that the NCAA

1 would cut rosters to 30 swimmers – the SEC would further cut rosters to just 22 – because of
2 the settlement in *House v. NCAA*, I would not have chosen Mizzou.

3 9. When schools recruit athletes, they make a commitment to keep athletes on the
4 roster as long as they are deserving of the investment and support it takes to excel at the sports
5 we love. Athletes like me have done nothing but work hard and follow the rules set out by the
6 SEC schools, and we deserve to have at least one more year to prove ourselves. But because of
7 the roster limits in the settlement (and the SEC’s even more dramatic limits), we find ourselves
8 on the outside looking in without fair notice. At minimum, athletes who weren’t subject to
9 roster limits before should be grandfathered in to allow schools to fulfill their commitments to
10 hardworking student athletes like me.

11 10. Most swimming student-athletes at risk of being cut are receiving little to no
12 financial compensation right now, but they are committed to swim anyway. I receive no
13 scholarship to swim at Mizzou, and many members of the freshman class are in the same or
14 similar boats. Money is not what this is about for us. If you gave anyone affected by these
15 roster cuts the option to remain at Mizzou as a walk-on, they would take that opportunity in a
16 heartbeat.

17 11. Even if the coaches said that I would get no gear and would have to pay for my
18 own travel for the next three years, I would jump at the opportunity to remain on the team. The
19 people affected by these cuts are not looking for NIL money, or even scholarship money. We
20 are simply asking for the opportunity to prove ourselves, and maybe one day earn money for
21 doing what we love. We are asking the NCAA and SEC to consider giving us the fair
22 opportunity that was promised to us back on signing day.

23 12. The roster cuts take away the ability for underclassmen to develop. When I
24 came to Mizzou, I was told by the coaches that freshman year was for development. I have

1 watched myself and my teammates get better technique in the pool and stronger in the
2 weightroom. Swimming is already one of the few college sports where freshmen are expected
3 to compete and score at conference their freshman year. By cutting the rosters after freshman
4 year you are taking away the ability for us to develop and reach our potential. Perhaps myself
5 or one of my teammates is the next breakout star or US Olympian, but because of these cuts
6 they will not even get the opportunity to make it to their sophomore year of swimming.

7 13. I currently sit around 50th for my event in the SEC. This past college football
8 season the receiver who had the 50th most yards was Missouri's Marquis Johnson. Johnson is
9 a sophomore who was a former three-star recruit. He is expected to be one of Mizzou's top
10 receivers next season. Could you imagine if he had been cut from the team here after his
11 freshman season? It wouldn't make any sense. That is because to expect an incoming
12 freshman to pick up the sport at the college level and compete in the best conference in the
13 country is just shy of insane. Sure, there are people who do it, but with the new roster limits
14 that will be the new expectation. There will be no more walk-on superstars who develop by
15 their junior or senior years, because these people will not even be given a shot. Cutting
16 swimming rosters to 22 would hurt not only college swimming but also USA swimming by not
17 allowing for proper development of underclassmen.

18 14. Almost 500 athletes are going to have to make an impossible at the end of this
19 season because of roster limits. I can either leave Mizzou to pursue my athletic career, or I can
20 give up the almost 15 years of hard work that it took to get here and quit swimming all together
21 so I can stay at my school. It is a pick your poison kind of choice.

22 15. Another school is not a realistic option. At Mizzou, I am enrolled in an
23 extremely selective business program that promises to set me up for future success. I am also
24 close to home where my friends and family have been able to watch me compete this year.

1 Perhaps most importantly, I have made the best friends I have ever had in my life through
2 Mizzou swimming. They are truly like a second family to me, and I don't know what I would
3 do without them. That is what I would be leaving behind if I wanted to continue my athletic
4 career.

5 16. This past year I have spent 20 hours in the pool, many hours studying to
6 maintain a high GPA, recruiting other swimmers, and participating in other athletic sponsored
7 events. I have committed my life to this. Because of the roster limits, I could be forced to let
8 all that go to waste and quit swimming entirely. This is the choice that so many athletes are
9 going to face. Changing schools is not easy, and neither is giving up on your dreams.

10 17. There is a simple solution to this. Do not approve the roster limits.

11 I declare under penalty of perjury that the foregoing is true and correct.

12 Dated: Columbia, Missouri
13 January 24, 2025



15 Trey Cunneen
16 NCAA ECID No. 2101996651
17 10416 Donoho Pl
18 St. Louis, MO 63131
19
20
21
22
23
24

Kiersten Dagg
103 Meadowgreen Dr.
Royersford, PA 19468

January 27, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken,

My name is Kiersten Dagg. I am a current Division I athlete at William & Mary; my NCAA ECID number is 2108305503. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,

Kiersten Dagg

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF KIERSTEN DAGG

I, Kiersten Dagg, hereby declare as follows pursuant to 28 U.S.C. §1746:

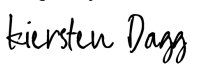
1. I am a Junior at William & Mary and am a member of the NCAA Division I Men's and Women's Swim Team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. Our coaches have explained to us that roster limits, if implemented, will cause our team to incur and suffer from cuts of four of our teammates. We do not yet know if these will be athletes currently on our team, incoming freshmen, or a combination. We do not want this and feel we should not have to worry about losing teammates or have any concerns surrounding our own position on the team. Added stress does not help performance or team spirit. Nor will a limited roster benefit our team.

3. We function as a team in and out of the pool. We eat together, study together, relax together, and live together; we have strong mentoring systems on our team and pride ourselves on helping one another in and out of the pool; we are a tight, supportive group. We worked incredibly hard throughout high school in order to have this opportunity; we all want to remain on this team and at our school, together. We do not feel roster limits help our team or our sport, but they will negatively impact those who are cut and our team at large.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Williamsburg, VA
January 27, 2025

Signed by:

DEAA8A001F30438

Kiersten Dagg
NCAA ECID No. 2108305503
103 Meadowgreen Dr.
Royersford PA, 19468

Landon D'Ariano
132 Hidden Pond Way
West Chester, PA 19382

January 27, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Landon D'Ariano. I am a current Division I athlete at the University of Texas – Austin. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2024.

Sincerely,
Landon D'Ariano

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF LANDON D'ARIANO**

9 I, Landon D'Ariano, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman on the men's swimming and diving team at the University of
11 Texas – Austin. I am a member of the Injunctive Relief Settlement Class and object individually
12 and on behalf of the class.

13 2. I began swimming at the age of 9. In high school, I was on my high school swim
14 team, as well as the Germantown Academy Aquatic Club team. My high school practice
15 schedule consumed a lot of my time: I had practice in the pool six days a week, including two
16 practices a day four times a week, in addition to weight training three times week.

17 3. During high school, I was a 3-time NCSA champion, 2-time USA National Junior
18 Team member, 4-time USA Swimming Scholastic All-American, and made the USA Olympic
19 Trials in the 200 IM and 400 IM.

20 4. During the recruitment process, I was contacted by around 100 schools. I
21 narrowed it down to four schools to visit. I ultimately decided that I wanted to go to Texas,
22 because of how legendary the program is, having produced Olympians and U.S. record holders,
23 and how much I love the school itself.

24 5. By going to Texas, I was giving up a bigger financial offer from another school,
25 but I would be swimming at my dream school, so it was worth it. I was very excited to get my
26 degree from a well-respected university in academics and be able to pursue my swimming career
27 while I was at it.

28 6. When I was being recruited, it was made clear that as long as I don't violate the

code of conduct and stay true to myself, I would be able to stay on the team.

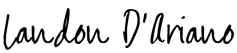
7. I first heard about the roster limits and the lawsuit the summer before I arrived at school. I didn't think too much about it at first, but as it got more traction and Texas switched from the Big 12 Conference to the SEC, the possibility became more real.

8. At the very first team meeting of the year, the coach talked about making cuts because there are roster limits included in the settlement, and the roster limits have been brought up in every meeting since then. We've been told that those who misbehave will be cut, but at other times the cuts seem to be fully performance based. It has created a lot of uncertainty and fear for all of us on the team.

9. Ultimately, I feel like these roster limits prevent younger athletes from developing, because they must come in already prepared to compete with the older kids. It's especially hard on freshmen because there's no room for freshmen to develop and reach their potential. I am asking that roster limits not be approved by the Court because they are unfair to the athletes.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Austin, Texas
January 27, 2025

Signed by:


Landon D'Ariano
132 Hidden Pond Way
West Chester, PA 19382

Micah Davis
1006 Granger Ave
Ann Arbor, MI 48104

01/28/2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Micah Davis. I am a current Division I athlete at Western Michigan University and my NCAA ECID number is 2110342314. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Micah Davis

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF MICAH DAVIS**

9 I, Micah Davis, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a Sophomore at the Western Michigan University and am a member of the
11 NCAA Division I men's football team. I am a member of the Injunctive Relief Settlement Class
12 and object both individually and on behalf of the class.

13 2. In high school I poured my blood, sweat, and tears into receiving the opportunity
14 to play D1 Football player. I missed out on my freshman and sophomore year of high school
15 football due to breaking my ankle weeks before my teams first games. I already had to fight
16 against the odds due to only playing my junior and senior year. Through those years I had year
17 round football trainings, practices 4 days a week during the season along with putting in work in
18 the weight room 6 days a week. I had to miss out on a lot of "normal" high school activities,
19 family events, vacations, etc. I spent more money, and time than most people could understand
20 traveling to extra practices, workouts, and camps. All of this just to receive the opportunity to
21 play at the next level.

22 3. I was the captain of my high schools varsity team helping lead us to a regional
23 championship my senior year. I was 2x all area, all region, all conference, and all state. I placed
24 in states for track 3 times and was an Adidas nationals track runner up in the 4x2.

25 4. I wasn't recruited highly due to my lack of football experience. I earned 2 D1
26 scholarship, along with many other opportunities to go play at the next level. My recruiting
27 experience was very stressful and frustrating. I never felt that I got the looks I deserved. I was
28 offered Preferred Walk-On spots to the University of Michigan, Michigan State, and Eastern

1 Michigan but in the end turned down scholarships to Marshall University, and University of UT
2 Martin to play at Michigan as a Walk-On.

3 5. I along with all the Walk-Ons had to figure out about the roster cuts on our own.
4 We would pay attention to the media, as well as what we experienced in our day to day lives at
5 Michigan. We were never told or warned that roster cuts would come into place. From my
6 understanding there was going to be around 50 guys being cut from our 135 man roster. I was
7 told by my coaches that they wanted to keep me on the roster however could not promise it. I
8 was told to stay and compete for my spot through bowl prep and spring ball of this last year.
9 Michigan told me I would play in our bowl game however the closer we got to game time they
10 started to reduce my play time and roster positions. I knew that my time at Michigan was coming
11 to an end, so I ended up transferring to insure a spot at this level elsewhere.

12 6. This whole process took a huge mental toll on me and my teammates. We had to
13 come in every day and work our butts off from 6 a.m to 8 p.m 6 days a week knowing that we
14 were going to be cut. As a walk-on you receive no grace and the range for error is zero. We were
15 held to a higher standard than scholarship athletes while being treated worse in every way
16 possible, and had to pay for our opportunity just to play football. I had to go back to my house
17 every night knowing that I was going to repeat the same stressful, physically abusive, and
18 mentally tolling day all over again while knowing that I was going to be cut

19 7. Being cut would impact a lot in my life. I would lose any sort of aid that a walk-
20 on gets. Such as occasional money used for tuition, tutoring, football supplied food, academic
21 counseling, and many other things. I've also lost some of my best friends that Ive built over the
22 past 2 years at Michigan. Not to mention the many problems arising around housing and what
23 my new life would look like.

24 8. I have entered to transfer portal to insure a spot at another school. The portal was
25 flooded and I've heard many players talk about not getting any interest from schools due to the
26 amount of players that have entered. Me having to transfer effected me more than what I could've
27 understood. I don't get to live with my best friend, and am away from the countless relationships
28 I've built for the last 2 years. I have to basically restart what I had built at Michigan elsewhere.

1 The school I chose to attend due to the roster limits uncertainty only accepted a number of my
2 credits I collected at Michigan. This will affect my timing on graduating.

3 9. I ask the court to hear me and countless others out and stop roster cuts from
4 coming into place. This decision will affect thousands of student athletes just like me who
5 worked our tails off just for opportunities. We knew the odds were against us to start and we
6 accepted that. Taking away football is like taking a large chunk of our lives. The relationships,
7 opportunities for the future, and our dreams will all be taken away. I've already had to deal with
8 this pain, and the discomfort of relocating and starting over. I wish the stress on no one else and
9 pray no one else has to go through it. I declare under penalty of perjury that the foregoing is true
10 and correct.

11 I declare under penalty of perjury that the foregoing is true and correct.

12 Dated: Ann Arbor, Michigan
13 January 28, 2025



Micah Davis
NCAA ECID No. 2110342314
1006 Granger Ave
Ann Arbor, MI 48104

Julia Janette Dean
4330 Little Canoe Channel NE,
Seattle, WA 98195

January 25, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Julia Dean. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 2208641673. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Julia Janette Dean

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION
6
7

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

8 **DECLARATION OF JULIA JANETTE DEAN**

9 I, Julia Dean, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a 2028 at the University of Washington and am a member of the NCAA
11 Division I women's rowing team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 2. The NCAA settlement agreement encapsulates many things that impact me as a
14 collegiate athlete greatly. As a rower, I am used to a large and welcoming team. When I was
15 looking at the University of Washington as my potential future school, this was something that
16 was so important to me. I come from a high school rowing team in a very small town, and our
17 full co-ed team was about 30 people. Because of this, we were tight knit, but we also experienced
18 plenty of issues. External feelings made their way into the team and the culture was forever
19 changed because of these. You had to see every single person every day and never had the chance
20 to meet any new people. This is why I strived to be a part of a huge and warm community, you
21 don't have these issues on a team so large because everything has to work out, and everyone is
22 mature is capable with a roster so large, because they understand the privilege and role you have
23 on a team like this. There's never a "top dog" with a huge ego because there are so many unique
24 people who truly care for one another. Our current roster borders on triple digits. I have been
25 given the opportunity to meet and become close with the coolest people ever. I have friends now
26 because of this team from Australia, the UK, Italy, Canada, and all across the US. These are
27 opportunities I would never have with a smaller team. Both I wouldn't be able to be here, and
28 they wouldn't be able to extend their radius.

1 3. Additionally, this community has given me strength and knowledge and shown
2 me the boundlessness of love and friendships. These girls are the hardest working and driven
3 people I have ever met, and the environment of a large team facilitates these qualities. With a
4 small roster we wouldn't have so many different personalities to motivate ourselves and compete
5 with. It's so important in a sport like rowing to be able to have inter squad healthy competition
6 with the people you love and its so hard to have this when the roster is just your top few boats,
7 we need people to develop through this competitive nature and environment.

8 4. Overall, to me roster cap would be detrimental to my rowing career. When I was
9 in the seventh grade before I even started rowing, I read "The Boys in the Boat". My entire
10 family had attended the University of Washington, so I've been a husky since birth. By the time
11 high school came around my freshman year started during COVID. I began rowing and it was
12 my escape. We could take out singles and be alone, and eventually we were able to take out
13 larger boats and become a real team. I found myself through rowing. I found a community
14 throughout the world, found my best friends in high school and college, found a true passion that
15 fulfilled me, unlike any of the other many sports I had tried, and found something that was truly
16 for me. I have never been the fastest on the team, I have few gold medals, but I have always
17 prided myself on being the hardest worker. I push myself in the workouts and also take care of
18 myself to the best of my ability. This team is my home. No place has welcomed me and cared
19 for me like this team. There is not one person I could not name and not one person who has said
20 anything but positive comments. Rowing is about the team. It is about the community. It's not
21 like gymnastics or baseball where everyone has their individual position. It is about coming
22 together to create a machine, and it is near impossible to do that with a roster cap. So please let
23 our programs shine, let our communities grow, and let our spirits fly. These people are my family
24 and we never want to let each other down.
25
26
27
28

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Dated: Seattle, WA, USA

3 January 25, 2025



Julia Dean

NCAA ECID No. 2208641673

4330 Little Canoe Channel NE,
Seattle, WA

Jackson DeBruin
8283 Velda Trail
Sarasota, FL 34241
January 22, 2025

RE: In re Collegiate Athlete NIL Litigation

Dear Judge Wilken,

My name is Jackson DeBruin. I am currently a Junior in Riverview High School in Sarasota, Florida. I am a student-athlete and have plans to swim with a Division 1 college once I graduate high school. My NCAA Eligibility ID# is 2312175069. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In RE Collegiate Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Jackson DeBruin

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF JACKSON DEBRUIN**

9 I, Jackson DeBruin, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a high school junior and swimmer and am being recruited to compete on a
11 Division I college team. I am a member of the Injunctive Relief Settlement Class and object both
12 individually and on behalf of the class.

13 2. I have been swimming competitively since I was seven years old. My parents
14 picked up and moved my family from Illinois to Florida in 2021 so that my two younger brothers
15 and I could continue to swim competitively and have the best possible training and chance to be
16 recruited by a Division I college. Over the last several years, I have been practicing about 20-22
17 hours per week in order to have the chance of being a Division I college athlete. That training
18 consists of both in-the-water training and dryland/conditioning with high level coaches and staff.
19 I have missed countless social activities and events with friends and family, as well as family
20 trips, functions, and gatherings in order to focus on my swimming career. I have the drive to
21 succeed in the sport of swimming in college and beyond, and I love to push myself to the limit
22 and I can promise that I'm not even close to reaching my limit, neither physically nor mentally.

23 3. I am currently around the top 150 of the high school class of 2026 male swimmer
24 recruits. I have four qualifying times for the U.S. Winter Juniors and three qualifying times for
25 the U.S. Open. I was awarded as a 2024 USA Swimming Scholastic All-American athlete, and
26 Riverview High School Scholar Athlete for my freshman, sophomore, and junior years.

27 4. When the recruiting process started for me on June 15, 2024, I was super excited,
28 because I had several Division I colleges reaching out to me and lengthy, personal phone

1 conversations with the coaches. As I made connections with these coaches, I was even more
2 enthusiastic about the whole recruiting process. I had about a handful of those Division I colleges
3 at the top of my list. Over the months that followed, I was slowly either being told that the rosters
4 of those schools that were so interested in me were filled due to the upcoming roster limits or
5 was receiving no return communication from them at all. It's been quite the roller coaster ride
6 for the last seven months. Sadly, the whole recruiting process has now come to a standstill for
7 me, and it is very frustrating.

8 5. I was made aware of the roster limits by the college coaches I've talked to, as they
9 have emphasized caution in moving forward until they know more regarding next steps. In
10 almost all cases, the college coaches have stopped communicating with me altogether.

11 6. I was really looking forward to the college recruiting process as I entered my
12 junior year in high school, but it has been anything but exciting. It has been exhausting and
13 frustrating as my entire college swimming career lies in the balance, and I'm not even sure that
14 I will ever accomplish my dream of swimming for a Division I college. I honestly thought that
15 by this time in my high school career I'd be committed to a Division I school and could focus
16 my time on current meets, as well as my studies in school. It has been stressful to know that my
17 future after high school is on the line, which also includes my dream of going to the Olympics.

18 7. I truly hope that this objection is heard as I, as well as so many other athletes,
19 have worked way too hard, for way too long, to push our bodies and minds beyond the limits to
20 be able to make it to a Division I college. We all aspire to do big things in the future, and I firmly
21 believe that for me, it starts with going to a Division I school that will help me to continue toward
22 my goal of reaching my full potential in the pool. The roster limits don't even give a high
23 performing high school athlete a chance by adding fifth year college students to the mix, as well
24 as completely inundating the transfer portal. Nothing about these roster limits seems reasonable
25 to the athletes. In almost all cases, athletes are the ones that not only perform at a high level in
26 their sports, but also in the classroom.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Dated: Sarasota, Florida

3 January 22, 2025

Jackson DeBruin

Jackson DeBruin

NCAA ECID No. 2312175069

8283 Velda Trail

Sarasota, FL 34241

Maeve DeYoung
19656 Suncrest Drive
West Linn, OR 97068

January 23, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Maeve DeYoung. I am a current Division I athlete at the University of Missouri and my NCAA ECID number 2109313122. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Maeve DeYoung

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4
5 IN RE COLLEGIATE ATHLETE NIL
6 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

7
8
9 **DECLARATION OF MAEVE DEYOUNG**

10 I, Maeve DeYoung, hereby declare as follows pursuant to 28 U.S.C. §1746:

11 1. I am a freshman swimmer on the University of Missouri's Division I swim and
12 dive team. I am a member of the Injunctive Relief Settlement Class and object both individually
13 and on behalf of the class.

14 2. I started swimming when I was six years old, and I was recruited to swim at
15 Missouri during high school. I am originally from Oregon, and I won the state championship in
16 the 100-yard back in my junior and senior years. In June 2022, the summer before my junior
17 year, coaches started reaching out to me. A lot of schools were interested in signing me. More
18 than 30 schools reached out to me about joining their programs. I narrowed it down to three and
19 went on official visits to these schools, including Missouri.

20
21 3. In November of my senior year, I signed a letter of intent that promised a spot on
22 the swim team for four years of college with an athletic scholarship. I picked Missouri even
23 though other schools offered me more money. I came to Missouri because of the team culture.
24 We treat each other like one big family. There are no cliques on our team. Every single team
25 member is valued. This type of culture was important to me.

26
27 4. The first time I heard from Missouri about potential roster cuts was in October
28 when our head coach told us that there were rumors going around about potential roster cuts in

1 the SEC. He told us that nothing was confirmed yet, but he believed that it was likely that roster
2 limits would be put in place for the following school year.

3 5. At this point, some of my teammates started worrying. People weren't
4 completely sure how many swimmers and divers would be cut from the team. Our coaches
5 indicated that more men than women would be cut if the limits were approved, so I saw
6 swimmers on the men's team grow extremely concerned about getting cut from the team. My
7 friends on the men's team began counting down the days until they might be cut. Everyone
8 knows that with transfers coming in, many swimmers will not be able to stay on the team.

10 6. In mid-December, we had additional meetings with the coaches. At that point,
11 we were told the number of transfers that might come in and how many roster spots would be
12 left. We also were told when individuals on the men's team could be cut: the end of February.
13 The coaches told everyone on both the men's and women's teams how to enter the transfer portal
14 in case we were to get cut.

16 7. At this point, the coaches have not formally cut anyone from the team. But they
17 have told individuals that their spots are at risk. The men's roster currently has roughly 30
18 swimmers. The coaches plan to maybe keep 15 of those individuals. On the women's side, the
19 cuts would not be as drastic, but the coaches told us that some women may be cut, too. Whether
20 they make cuts depends on whether roster limits are adopted that cause higher-ranked schools to
21 make cuts, because swimmers from those schools could transfer to Missouri.

23 8. I do not think I am at a high risk of being cut. But I am very concerned about my
24 friends getting cut. Here at Mizzou, we have a freshman class made up of 12 men and 10 women.
25 I feel like the freshmen are most at risk because we are the newest members of the team and do
26 not have seniority here.

27 9. These teammates have truly become some of my best friends and are like a second
28

1 family to me. I am always with my teammates. We all live on the same floor of the same dorm.
2 It would be devastating to lose some of them.

3 10. The culture of our team is going to change completely if a large clump of
4 individuals is cut. The mental health of the cut athletes, as well as the athletes who get to stay
5 on the team, will decline severely. And, further, the cut athletes will lose access to the mental
6 health counseling that we receive for free as part of our benefits at Mizzou.

7
8 11. The primary goal of the NCAA is to support the success and well-being of
9 student-athletes, but if the settlement is approved, my teammates—and athletes across the
10 country—will be severely affected and not taken care of.

11 12. This new settlement's main victims are non-revenue sports athletes, especially the
12 college class of 2028. Over a year ago, we all signed four-year scholarship agreements with our
13 universities without the knowledge that our teams would be downsized tremendously. This is
14 extremely unfair.

15
16 13. It is a huge decision to transfer to another school. I know some swimmers who
17 are older than me and who swam Division I when their colleges shut down their programs during
18 the pandemic. These student-athletes faced major academic setbacks when transfer universities
19 did not accept certain credits. In some cases, they had to delay graduating or retake certain
20 classes. If you are blindsided by some unexpected shutdown or rule change and must transfer,
21 it is very difficult to rearrange your life and your future plans.

22
23 14. Further, if schools decide to cut juniors and seniors from the team, plenty of those
24 student-athletes will choose to quit their sport altogether instead of transferring and risking their
25 academic progress at another school. If I were cut as a junior or senior, that is what I'd do. I
26 believe this is against what the NCAA is about. College athletes planned to swim for four years
27 of college. We should be able to do so without concern for our roster spots.
28

1 15. These roster limits are toxic and harmful to athletes. They go against everything
2 the NCAA stands for. I hope that the Court will not approve the settlement with them in it.

3 I declare under penalty of perjury that the foregoing is true and correct.
4

5 Dated: Columbia, Missouri
6 January 23, 2025
7



8 Maeve DeYoung
9 NCAA ECID No. 2109313122
10 19656 Suncrest Drive
11 West Linn, OR 97068
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Alyssa Dittoe
4330 Little Canoe Channel NE
Seattle, WA 98195

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Alyssa Dittoe. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 2403246531. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Alyssa Dittoe

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW
Hon. Claudia Wilken

6
7 **DECLARATION OF ALYSSA DITTOE**

8 I, Alyssa Dittoe, hereby declare as follows pursuant to 28 U.S.C. §1746:

9 1. I am a freshman at the University of Washington and am a member of the
10 NCAA Division I women's rowing team. I am a member of the Injunctive Relief Settlement
11 Class and object both individually and on behalf of the class. Last year I was recruited by the
12 rowing team as a walk-on, with no true experience or knowledge of the sport. The only
13 thing I had to my name was 7 years of club and high school volleyball. The year before that,
14 I was in the worst shape of my life, both mentally and physically. I was diagnosed with
15 Anorexia Nervosa, a disease that can chip your life away.
16

17 2. Anorexia set me back, all my efforts were put toward ED recovery, and everything
18 else was cast aside. I had planned to get recruited for volleyball, but this made me late to the
19 punch; the number of recruiting coaches was dwindling, and I was running short on options.
20 Then, I was given an unanticipated opportunity. My dream school's rowing team was still
21 recruiting for the class of 2028. Rowing was a light at the end of the tunnel, I saw an
22 opportunity to escape from the personal purgatory I had curated. A community of powerful
23 women, dedicated to lifting each other up, competing to be the best, and finding the version of
24 themselves that makes them unstoppable. It was just what I needed, I wanted to feel strong.
25 Moving forward with the intention of rowing at the UW that fall, that spring of my senior year I
26 fully dedicated myself to recovery. I just needed time to get there.
27
28

1 3. And with it I did. After using the summer to hone in on my fueling and training
2 habits, I had built myself back up to the bare minimum I needed to survive in such a
3 demanding environment. I entered fall with a fiery passion to pave a path for myself.
4 However, it wasn't soon before I realized that the bare minimum wasn't cutting it. I needed
5 more. More strength, more food, more speed, more time.
6

7 4. Gradually, things started to fall into place. I found myself. Starting with the
8 outstanding community that I found on the team. Friends that have changed my life for the
9 better, and I can't imagine losing to the transfer portal because of roster cuts. I found a love for
10 improvement, being out on the water, setting a rhythm on the erg, and getting stronger. Every
11 day I see a new way that I've progressed, whether it's a lower split or a higher weight at lift.
12 And it's not just me, I'm surrounded by a hundred other women who have dedicated themselves
13 to embracing the hurt, to relentless improvement. We inspire each other to work harder every
14 day, it's vital to the team's psyche. Time has built this community, brick by brick, person by
15 person, and roster cuts threaten to cut it in half.
16

17 5. If it weren't for time, I wouldn't be here today. It took time to heal from anorexia. It
18 took time to build my strength back up. It's taking time for my coaches to develop me on the
19 water. It took time to get my 6k time to where it is now, and it's going to take even more time
20 to get it to where it needs to be for me to make varsity next year. Time is crucial to athletic
21 development, no athlete should have it taken away from them. Roster cuts would hurt athletes
22 who need that extra bit of practice, who have the potential to do great things but need
23 some more work. Someone like me, a walk-on who has started from the bottom of the
24 barrel and is slowly but surely working their way up, can't be excluded from the equation. The
25 December first roster cap deadline is what could do just that.
26
27
28

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 26, 2025

Seattle, Washington

Signed by:

Alyssa Dittoe

411857BB86FC4C9...

Alyssa Dittoe

NCAA ECID No. 2403246531

4330 Little Canoe Channel NE

Seattle, WA 98195

Jenna Doolen
14501 Eastwood Dr.
Arcadia, OK 73007

January 18, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Jenna Doolen. I am a high school student aspiring to be a future Division I athlete, and a member of the Injunctive Relief Class. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Jenna Doolen

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7 **DECLARATION OF JENNA DOOLEN**

8 I, Jenna Doolen, hereby declare as follows pursuant to 28 U.S.C. § 1746:

9 1. I am an 18-year-old high school senior. I live with my parents in Arcadia,
10 Oklahoma. I am a member of the Injunctive Relief Settlement Class. I object individually and
11 on behalf of the class.

12 2. I run on the track and field and cross-country teams at Edmond Memorial High
13 School. Our mascot is the Bulldogs.

14 3. I've run track for four years, and I knew from the beginning that I wanted to run
15 on a Division I college team. My mother played Division I soccer and playing on a Division I
16 team in college feels like carrying out her legacy. Ever since I was a freshman, it has been my
17 dream to run track in college.

18 4. Throughout high school, I worked hard to get recruited to a top-level college track
19 and field team. I know I'm good enough for Division I. In my junior year, I won the Oklahoma
20 State Championship 400-meter race, Division 6A, which is the highest division in the state.

21 5. I was being recruited by my dream school even before I won the state
22 championship in spring 2024. Earlier in junior year, I had a track meet at University of Kansas
23 on April 18-20, 2024. The University of Missouri, Kansas City (UMKC) coach came up and
24 spoke with me after the meet. Later, and just five minutes after I won the state championship,
25 he called to congratulate me on my victory.

26 6. I was working on getting recruited by a few schools after the state championship.
27 The recruiting process is stressful, and I had a few important requirements for college. I didn't
28 want to be too far away from home, and I wanted to study business. The UMKC was a little

1 further from home than I preferred, but I made an exception because it was my number one. It
2 was also perfect because the business program at UMKC does not have coursework on Fridays,
3 which fits well with a track and field schedule. Meets are on the weekend and traveling happens
4 on Fridays, so UMKC would allow me to focus on track without sacrificing academics.

5 7. Most importantly, however, I needed an athletic scholarship to afford college.
6 Even though I wanted to run for UMKC, I knew I need to keep my options open. I visited a few
7 other schools in the summer, but my heart was set on UMKC.

8 8. Then on July 8, 2024, my dream school came through. The UMKC coach visited
9 my home and promised that I would get a spot on the track and field team and a scholarship if I
10 came to campus. I was ecstatic. I stopped actively pursuing recruitment with other schools
11 quickly.

12 9. I visited UMKC on September 15-16, 2024. There, the coach answered all of my
13 questions and concerns. He reassured me even if I didn't meet expected times, I would not lose
14 my scholarship. He told me performance would be a reflection of coaching, not me. I also got
15 to meet the team, and we bonded immediately. We even went to Top Golf for a few hours to
16 hang out.

17 10. Then the coach verbally offered me admission and a generous athletic scholarship
18 to run track for all four years of college. It was better than I could have imagined.

19 11. I received a written offer for a near-full ride scholarship with a total value of
20 \$18,356 my freshman year. The scholarship covered full tuition, and the coach told me that it
21 would keep up with tuition increases every year. I was also offered a \$3,000 stipend, and the
22 coach said that the stipend could be bumped up to \$5,000 based on my expected performance in
23 high school this season. The only thing that wasn't covered was the full cost of housing, but I
24 had the option to live with the other girls on the track team, which would cost less. The coach
25 also told me that if I shaved two seconds off my time, I could potentially get more aid that could
26 cover housing.

27 12. After receiving the scholarship offer, I was absolutely committed to UMKC and
28 cut off other colleges. I couldn't wait for signing day in November when I would officially

1 accept UMKC's offer.

2 13. Then two days before signing day, the coach called and told me my offer was
3 being retracted. Not only would I no longer be offered the scholarship or the stipend, but I also
4 couldn't even be on the team. He told me the reason UMKC broke its promise is because of new
5 roster limits in the *House* settlement, and that the school had put a freeze on 2025 recruitment
6 for all Olympic sports. I was still admitted to the UMKC if I wanted to go, but I couldn't run on
7 the team or get a scholarship. I couldn't even try out as a walk-on. He said that if the roster
8 limits are not approved, he might be able to get me back on the team. Otherwise if I went in
9 2025, I'd have to give up running competitively.

10 14. That was one of the worst days of my life. I found out in the middle of the school
11 day. I was so devastated, I had to leave early and go home, even though that ruined the perfect
12 attendance record that I am proud of.

13 15. I can't afford UMKC without a scholarship. Even if I could, I don't want to go
14 to college and not be able to run track. I had to restart my recruiting search all over again. By
15 then, it was too late.

16 16. I'm looking at other schools again, but I am finding it impossible to find a college
17 that has open roster spots on track and field for their incoming classes. There just aren't enough
18 spots available if the settlement goes through, and every school I have tried to get into is limiting
19 their freshman roster already. And every other school I'd been talking to had already made their
20 financial aid commitments. There was no money left. I have little hope that I will be able to get
21 the same offer I got from UMKC somewhere else.

22 17. I don't blame the UMKC coach. He was not happy about having to pull my offer.
23 The coach and I bonded so well during the recruiting season that even after he told me the terrible
24 news, he is helping me attempt to find another college to run at for next year. Still, it is hard.

25 18. Taking a gap year and waiting for the next season is not an option. A gap year
26 would completely derail my athletic career. I'd no longer be able to train and race on a team. If
27 I don't get on a track team for the 2025 season, my running career is over.

28 19. I am in limbo. I have been admitted to a few schools, but there is no financial aid

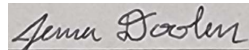
1 left, and they haven't even been able to offer me a spot on the track team. I'm holding out hope
2 for a partial scholarship from one school, but it's much further from home than UMKC.

3 20. I feel anxious and depressed all the time. A lot of my teammates on the track
4 team are struggling the same way with recruitment, but I'm the only one who had my scholarship
5 taken away. My track coach said he's never seen anything like this before.

6 21. I don't know what to do now. All I have ever wanted to do is run track. I am
7 good at it, and I did everything right to run at my dream school. I never expected to be paid for
8 doing what I love. Now I probably can't do it at all. My whole world turned upside down in an
9 instant for no good reason.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Dated: Arcadia, Oklahoma
12 January 18, 2025



Jenna Doolen
NCAA ECID No. 2306929354
14501 Eastwood Dr.
Arcadia, OK 73007

Sarah Dunham
415 Richmond Rd
Williamsburg, VA 23185

January 27, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Sarah Dunham. I am a current Division I athlete at the College of William & Mary and my NCAA ECID number is 2203460287. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Sarah Dunham

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF SARAH DUNHAM

I, Sarah Dunham, hereby declare as follows pursuant to 28 U.S.C. § 1746:


1. I am a sophomore at the College of William & Mary and am a member of the NCAA Division I Men's and Women's Swim Team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. Our coaches have explained to us that roster limits if implemented, will cause our team to incur and suffer from cuts of four of our teammates. We do not yet know if these will be athletes currently on our team, incoming freshmen, or a combination. We do not want this and feel we should not have to worry about losing teammates or have any concerns surrounding our own position on the team. Added stress does not help performance or team spirit. Nor will a limited roster benefit our team.

3. We function as a team in and out of the pool. We eat together, study together, relax together, and live together; we have strong mentoring systems on our team and pride ourselves on helping one another in and out of the pool; we are a tight, supportive group. We worked incredibly hard throughout high school in order to have this opportunity; we all want to remain on this team and at our school, together. We do not feel roster limits help our team or our sport, but they will negatively impact those who are cut and our team at large.

I declare under penalty of perjury that the foregoing is true and correct.

1 Dated: Williamsburg, VA
2 January 27, 2025

Signed by:

D4E2D0A60DC0403
Sarah Dunham
NCAA ECID No. 2203460287
415 Richmond Road,
Williamsburg, VA 23185

Thor Dyke

901 Canterbury Rd
Raleigh, NC 27607

January 27, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken,,

My name is Thor Dyke. I am a current Division I athlete at William & Mary; my NCAA ECID number is 2109320935. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate the firm of MoloLamken LLP to speak on my behalf at t Fairness Hearing on April 7, 2025.

Sincerely,

Thor Dyke

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF THOR DYKE

I, Thor Dyke, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a member of the class of 2027 at the College of William and Mary and a member of the NCAA Division I Men’s Swim team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. I practiced in and out of the pool for 20-25 hours a week during high school to have the chance of being a Division I college athlete. I dedicated thousands of hours to the sport including lifts, two practices a day, and even beginning my coaching career in high school with the intention of continuing it during and after college. I sacrificed a lot of a “normal” high school experience, often missing social events and other activities. As a result of my hard work, I was a North Carolina State Championship qualifier, regional champion, and state record holder, along with being captain of my club and high school swimming team.

3. Getting recruited for college is hard. The experience of swimming in college is cutthroat and athletes are constantly fighting mental and physical battles. Eliminating roster spots for current athletes and high schoolers won’t help these issues.

4. I learned about roster limits through countless social media posts discussing Grant House. As a swimmer he knows how hard it is to continue the sport throughout college. He was lucky enough to have swum in college for seven years and now he is trying to take it away from others.

5. Our coach here at William and Mary told us about how we are cutting four girls at the end of the year and the whole pool deck went silent. I have never heard a pool deck as

1 quiet as I did then. It was possibly the worst experience I have had in the sport, even worse than
2 injury or poor results on meet day.

3 6. This is taking a huge mental toll on people not just as athletes, but as humans.
4 How would you feel if the thing that has been such a big part of your life—like swimming to me
5 and my teammates—was ripped away in an instant because of a court case? These are young
6 men and women that are being affected. Cutting them from their respective teams will be
7 detrimental to their current mental health and their future.

8 7. If I were cut, it would be disastrous. It would affect many aspects of my life and
9 I would lose many things. One, I would lose the one sport that I have been working towards my
10 whole life. Two, I would lose friends, relationships, mentors and even the possibility of staying
11 in the school because of monetary reasons. I would never want this to happen to someone else.

12 8. These roster limits will not affect me as an individual, but I have mentored many
13 current college athletes. These people are like my brothers or sisters, and many will be or have
14 already been cut by their programs. Almost all of my friends from my high school club team
15 are currently swimming Division I. Well over half of them have now been cut, which is a terrible
16 situation to be in.

17 9. Please give the next generations the same fair opportunities that me, my
18 teammates, and alumni have had in the past. Think of this as if it was your kid. Would you want
19 your kid to be cut from the sport they've worked so hard at for the past 10-15 years of their life?
20 I ask that you do not approve the settlement with the roster limits in it.

21 I declare under penalty of perjury that the foregoing is true and correct.

22 Dated: Raleigh, Wake County, NC

23 January 27, 2025

Signed by:



EAf8F9776B6C4A8...

Thor Dyke

NCAA ECID No. 2109320935

901 Canterbury Rd

Raleigh, NC 27607

Emily Ellis
21010 Aqua Bay Court
Cypress, TX 77433

January 4, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Emily Ellis. I am a current Division I athlete at the University of Tennessee and my NCAA ECID number is 2106217274. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Emily Ellis

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF EMILY ELLIS**

9 I, Emily Ellis, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a sophomore at the University of Tennessee, where I compete as a member
11 of the cross country and track teams. As explained below, I object to the roster limits included
12 in the Injunctive Relief Settlement that is part of the proposed settlement in this lawsuit. I am a
13 member of the Injunctive Relief Settlement Class and object on behalf of the class.

14 2. I am from Cypress, Texas, where I competed in high school cross country and
15 track. I was named All-State in each of 2020, 2021, and 2022 as a cross country/distance track
16 runner. I am particularly proud of having ran a personal best of 17:32 for the 5,000m (a district
17 record) in 2020 and being a 17-time UIL 6A individual champion in cross country and track. I
18 was recruited by several schools with scholarship offers. I chose the University of Tennessee as
19 the best place for me to both compete on nationally ranked cross country and track and field
20 programs as well as to receive an excellent education.

21 3. The University of Tennessee women's cross country roster currently consists of
22 27 runners and the women's track and field roster currently consists of 55 runners. Currently
23 there are no roster limits for these sports. However, the roster limits proposed for those sports
24 in the proposed settlement are 17 and 45, respectively, so at least 10 women have to be cut from
25 each of those teams if the roster limits go into effect.

26 4. During the most recent season, the fall 2024 season for cross country, I had two
27 separate injuries that prevented me from running in meets. Such injuries are common for
28 distance runners, where the volume of work inevitably injures a significant portion of every

1 team, often in the range of 30% of a team at any given time. When injured, a runner still spends
2 a considerable amount of time working through physical therapy to recover and compete again,
3 and indeed I was able to recover from my injuries and am healthy to run. Most distance runners
4 are injured for at least some portion of their collegiate career.

5 5. Nevertheless, in early December 2024 I had a meeting with my assistant cross-
6 country coach where she told me that I would be cut from the team if the roster limits that are a
7 part of the proposed settlement in this lawsuit were approved. She said if the roster limits do not
8 go into effect, that I would be able to remain on the team and be able to compete for the rest of
9 my career at Tennessee.

10 6. Competing in cross country and track for the University of Tennessee has been
11 an incredibly important part of my collegiate experience. Starting even before high school, being
12 a runner has been an important part of my identity. That part of my identity has grown even
13 more in college. The prospect of being cut from the roster feels like losing that important piece
14 of my identity.

15 7. Being cut from my team would also mean losing out on spending time with the
16 close friends I have made on the Tennessee cross country team. If some of my teammates and I
17 are cut from the team, we will no longer be able to train together, have team meals together, and
18 we may not even be able to attend the same school.

19 8. As a result of the threat of the roster limits being imposed, some of my teammates
20 have already entered the transfer portal in hopes of being able to run competitively at another
21 school, and others have discussed being interested in entering the transfer portal later this year.
22 If my teammates lose the financial benefits the University of Tennessee provides their athletes,
23 they may not have the choice of staying at the University of Tennessee because of the financial
24 costs and may be forced to transfer.

25 9. In considering my personal circumstances, I also recognize that I have come to
26 truly enjoy my major in Biosystems Engineering. Before the announced roster limits, my path
27 was clear – to continue running at Tennessee and earn a bachelor's degree in Biosystems
28 Engineering. I want to continue running competitively, but being a Biosystems Engineering

major makes that very difficult. Tennessee is one of the few universities in the country to have a major in Biosystems Engineering, and the list of those schools that also have competitive running programs is very small. I believe Tennessee is the best combination, and while there is one other school that is strong in both – Auburn University – it currently has 31 women on its cross country team and will have an even greater roster spot problem than Tennessee, so it is not a realistic option.

10. Transferring may also derail my studies. I earned a 3.8 GPA and made the Dean's List each semester at Tennessee. Going to a new school midstream risks disrupting my successful academic record and may cause me to be required to retake certain courses or take additional courses which will increase costs and delay my graduation.

11. I also will be facing serious financial hardships if I am cut from the cross country and track teams. Over the past year I received the following, all of which will be taken away if the proposed roster limits are imposed:

- a. \$7,785.35 as a tuition benefit for summer semester classes given by the University of Tennessee to student athletes, which covered two classes I was able to take over the summer toward my major;
- b. \$4,260.00 per year in the form of a summer stipend offered by the University of Tennessee to student athletes;
- c. \$2,990.00 per semester in Alston Awards for education expenses;¹
- d. a meal plan in the student-athlete's cafeteria, which otherwise costs \$4,986 if bought from the school; and
- e. medical insurance and benefits, which otherwise would have cost \$2,928 for the year.

12. The total value of these benefits for my remaining years at Tennessee would be \$25,939.35 per year if the school's prices remain the same, but they will probably increase. If

¹ Alston Awards are named after the Supreme Court's decision in *Nat'l Collegiate Athletic Ass'n v. Alston*, 594 U.S. 69 (2021).

1 roster limits are imposed, I will need to find a way to cover these costs on my own.

2 I declare under penalty of perjury that the foregoing is true and correct.

3 Dated: Cypress, Texas

4 January 4, 2025



5 Emily Ellis

6 NCAA ECID No.: 2106217274

7 21010 Aqua Bay Court

8 Cypress, TX 77433

Emma Ervi
704 Kings Rd
Lynchburg, VA 24502

January 29, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Emma Ervi. I am a current Division I athlete at Liberty University and my NCAA ECID number is 2309999975. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Emma Ervi

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF EMMA ERVI

I, Emma Ervi, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a freshman at the Liberty University and am a member of the NCAA Division I women's Cross-Country team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. I have practice Monday through Saturday for two-three hours. I lift three times a week for an hour each session. I run over forty miles a week, which includes easy normal runs Monday and Thursday, workouts Tuesday and Friday, a cross train on Wednesday, and a long run or race on Saturday. Cross Country requires intentional sacrifices to sleep over eight hours a night, eat enough calories to recover and keep my body strong, hydrate, and recovering via ice baths, stretching and rolling, and seeing the trainers. In addition to these things, I am pursuing a major in Business Finance and outside of practice, I highly prioritize time to do homework and stay on top of my assignments by communicating with teachers about traveling for meets and things like that. Maintaining A's in school and reaching for faster times on the track cause me to miss social events even as simple as Hall meetings and Community groups. Being an NCAA D1 athlete is not easy, and it takes hard work and dedication so school and sport.

3. This season, I broke my PR of 18:30 and ran 17:53 for the 5K and in the 21:00s for the 6K. I ran 4:58 in the mile when my original PR was 5:02.

4. When I was recruited, I had just run the best track season and started considering running in college. Then, Coach Heather reached out to me about recruitment and then a visit and I was so excited. I never would have dreamed that I would run D1 at any college, let alone

1 Liberty University. I was already looking to attend Liberty because they are a Christian school,
2 and they teach their subjects from a Chrisian worldview. When I started looking to run at Liberty,
3 I really wanted a team atmosphere what would pull me closer to the Lord and push me to run
4 faster. My sister has walked on to the LU team her freshman year and she would be going into
5 her junior year on the team when I was coming on. As I committed to the team, I had the
6 understanding that I was not on scholarship, but I could be added when I ran the times. I was
7 also under the impression that I would have four years to achieve this goal, providing that I did
8 not have an injury or decided to stop running. I was ready to run for liberty all four years and
9 build friendships with the thirteen other freshman that came on with me.

10 5. I had heard rumors from social media and other connections with other runners
11 at other schools. Then, our head coaches called a meeting and told us that the NCAA has enacted
12 a rule that is drastically cutting roster spots after the spring season. They made it clear that to be
13 safe from the cut was to be on scholarship and, if they had room, they could hold tryouts at the
14 beginning of next semester (Fall of 2025). They made it clear that our following races did not
15 determine who was on the roster next year and that they did not know the true number of spots
16 we had. However, they did know roughly that the maximum number we would be allowed. We
17 have 33 girls on our team, and we would have to cut to 17 or maybe less.

18 6. Yes, it has impacted our team tremendously. First, my roommate, Lila
19 Bensenhaver, left the team because she came to LU to run. It was so sad that she had to leave
20 because we both wanted to be roommates again in the following semesters at Liberty. Second,
21 the rule has changed our team culture. This is not at all influenced by the coaches because they
22 have made it clear that so decisions about cuts have been made. It is solely since there is a limit
23 and our running for Liberty Track and Field and Cross Country has been cut terribly short. It is
24 an impossible feat to see the end drawing near and not be sad and even a little stressed about it.
25 Our team culture is amazing, uplifting, encouraging, and Christ-centered, but it's not without
26 sadness and heavy hearts that we view this NCAA ruling. There is more to life than sports but,
27 but I want Track and Field to be a part of my life. I feel that the choice has been taken from me,
28 forcing me to walk away from high level competition against my will. When we walk into the

locker room, some of us think, this will not be the same next year and start to wonder if we will still see our teammates when we aren't running. Competing is stressful for any athlete, but it should but be tainted with the thought that it's possibly their last.

7. I will lose running with an amazing group of girls at a D1 level. I will lose the ability of choosing my housing early and my roommate. I will lose the ability to choose my classes early and access to an academic coordinator that helps me get tutors, communicates to my professors, helps me get extensions for assignments, and helps me think through future classes so that I can graduate. I will lose access to athletic trainers, hot tubs, cold tubs, recovery pants, cupping, stem, and the athletic center that offers snacks and quiet places to study. I will lose access to the indoor track facilities, which includes a private weight room, locker rooms, recovery room for stretching and rolling, protein shakes. And a beautiful track to run on. I will lose eating at the special dining hall for athletes that opens three times a week. I will lose the ability to earn athletic scholarships. I have lost multiple friends, my roommate Lila that I've already mentioned, and many more that are transferring next semester to continue their collegiate running careers. I lose the title of being a D1 athlete and coaching from knowledgeable coaches. I lose personalized training plans, training logs, and weightlifting routines.

8. As a result of the ruling, I will cease to be a D1 athlete become and regular student at Liberty University. Liberty has the degree I want along with the minor I am pursuing. But I also decided to come here because they recruited me to run. I have been a serious runner for a long time, and I love competing. Due to the roster limits, I will be forced to stop competing because I will not have coaching, training plans, lifting routines, trainers, academic help, or a place to train and compete at a high level. Going from running competitively at a D1 level then going to a for run club is not a fair trade. That is not the equivalent of running for a collegiate sports team. It is an insult to go from almost hitting scholarship worthy times to running with people who have never raced in their life.

9. This roster limit should not be allowed. Athletes should not have their colligate careers cut short against their will. There is a plethora of talent on Liberty Track and Field and to cut them would be to waste God-given talent because of a lack of opportunity. The ruling has

1 already caused heartache and tension amongst teams and is separating teams that should stay
2 together.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Dated: Lynchburg, Virginia

5 January 29, 2025

Signed by:

Emma Ervi

DDA418E458654EE

Emma Ervi

NCAA ECID No. 230999995

704 Kings Rd

Lynchburg, VA 24502

Adelyn Fairley
143 Crozier Dr.
Lynchburg, VA 24502

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Adelyn Fairley. I am a current Division I athlete at Liberty University and my NCAA ECID number is 1809300190. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,

/s/ Adelyn Fairley

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF ADELYN FAIRLEY**

9 I, Adelyn Fairley, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a graduate student in my sixth year at Liberty University and am a member
11 of the NCAA Division I women's cross country and track teams. I am a member of the
12 Injunctive Relief Settlement Class and object both individually and on behalf of the class.

13 2. Throughout my athletic career, I have worked tirelessly to excel in my sport. In
14 high school, I was recruited by several universities, including Michigan State University, the
15 University of Michigan, Grand Valley State, and Cedarville University. I ultimately chose to
16 attend Liberty University on an athletic scholarship because I thought it was the best fit for me.

17 3. My athletic accomplishments include winning eight conference titles, qualifying
18 twice for the NCAA Cross Country Nationals, and contributing to Liberty's first-ever team
19 qualification at Nationals. I have also set numerous records, including the ASUN 3K conference
20 record and Liberty's 10K program record. These achievements reflect the immense time, effort,
21 and sacrifice I have invested in my sport.

22 4. The potential implementation of roster limits has profoundly impacted me and
23 my teammates. While I am at the end of my NCAA eligibility, I have witnessed the devastating
24 effects this issue has had on our team. Several of my teammates have been forced to transfer,
25 disrupting their lives and leaving them uncertain about their futures. Other teammates have had
26 their athletic careers cut short altogether. Seeing these opportunities taken away from athletes
27 who have dedicated their lives to the sport is both unfair and disheartening.

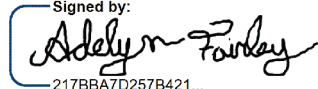
28 5. My teammates and I were promised the opportunity to compete for four years as

part of the team. However, the looming roster limits have broken these promises, leaving many athletes unable to fully realize their potential. This situation has created a sense of instability and stress that has affected our team dynamic, and ability to perform at our best without thinking about the implications of the roster limits on next years team.

6. I respectfully ask the Court to reject the implementation of roster limits. These arbitrary restrictions undermine the principles of fairness and opportunity that collegiate athletics should uphold. Every athlete deserves the chance to compete and achieve their goals without facing sudden and unjust barriers.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Lynchburg, Virginia
January 28, 2025

Signed by:

217BBA7D257B421...
Adelyn Fairley
NCAA ECID No. 1809300190
143 Crozier Dr.
Lynchburg, VA 24502

Anakin Fischer
901 Hitt St, Columbia, MO 65201

January 24, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Anakin Fischer. I am a current Division I athlete at the University of Missouri and my NCAA ECID number is 2107283735. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Anakin Fischer

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF ANAKIN FISCHER**

9 I, Anakin Fischer, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman at the University of Missouri and a member of the NCAA
11 Division I men's swim team. I am a member of the Injunctive Relief Settlement Class and object
12 both individually and on behalf of the class.

13 2. I am extremely blessed to have been given the opportunity to compete as a
14 Division I athlete in the NCAA at a program in the Southeastern Conference (SEC). However,
15 this did not come without great time commitment and work. I had been swimming competitively
16 for over a decade when I received the offer to attend and compete at the University of Missouri.
17 This included averaging around 18 hours of practice in the pool each week, with an additional
18 12 hours of weight training and recovery. With three practices a week starting at 5:30 AM, and
19 hours of homework to do each night when I returned home from afternoon practice, I consistently
20 went without a full night's sleep.

21 3. On top of this, weekends were often occupied with competition. These were
22 usually raced in a preliminary/final format with two separate sessions each day, requiring full
23 commitment to the sport. Not to mention that there were several competitions requiring travel
24 to cities like Indianapolis or Orlando. This was demanding on myself as I was forced to miss
25 days of school in order to attend these meets and compete at a high level. If I was fortunate
26 enough to have the meet align with a break from school, I had to give up the possibility of a
27 vacation to attend. As a result of this, I often missed out on social events. There is even a joke
28 within the swimming community that when asked if we are available to spend time with

1 someone, the response is always “Sorry, I have to swim.” I gave up countless vacations, family
2 trips, social events with friends, and much more due to my commitment to my sport.

3 4. These are just the sacrifices that I made, however. My parents had to commit
4 hundreds of hours into supporting me as well. If I had a swim meet, they had to be there as well,
5 giving up their weekends, and occasionally needing to take off work. Not only did they have to
6 spectate and support me at these meets, but they had to fund my participation. Unfortunately,
7 this sport is not cheap either. A new competition suit can cost hundreds of dollars, and equipment
8 for training has a similar price tag. When I traveled for a meeting, they had to pay for a hotel,
9 flights, food, rental cars, and other expenses. My family sacrificed greatly to give me the
10 opportunity to compete at such a high level.

11 5. Thankfully, all of this work paid off. By the end of my sophomore year I had
12 achieved 3 Speedo Winter Junior Qualifying times in my best events. I participated on a relay
13 team that set 7 different Wisconsin State Records. I had also won the Wisconsin Swimming
14 LSC State Championship several times. By the time I graduated high school I was a 21-time
15 champion at this meet and a two-time overall high point champion. My high school team,
16 Arrowhead Union High School, was runner up at the Wisconsin Interscholastic Athletic
17 Association State Championship as well. Concluding my four years on this team, I hold three
18 school records, won an event at the Greater Eight Conference Meet 8 times, and placed in the
19 top five at the state meet 5 times as well.

20 6. Due to my achievements, I was recruited by many Division I programs, beginning
21 on June 15th of my sophomore year. This included schools in the SEC, ACC, PAC-12, BIG 10,
22 and Ivy League. When I was being recruited, I was looking for a team that could support both
23 parts of being a student athlete: helping me develop into a better swimmer and grow as a person
24 during my college experience. I was able to narrow down my list of options until finally
25 accepting the offer I received from Coach Andrew Grevers at the University of Missouri.

26 7. This was a hard decision to make, as I had other offers from alternative programs.
27 There was also a long period of time where I considered not competing in college. In high
28 school, I was a National Merit Scholarship Finalist with a high GPA and could have attended

1 several renowned academic institutions. However, this school had what I wanted out of a
2 program, with positive coaching, great academic and athletic resources, a beautiful campus, up
3 to date facilities, and a strong, thriving team culture.

4 8. When I accepted this offer and verbally committed, it was under the
5 understanding that I was on the team for four years. While the coaching staff did inform me that
6 there was a code of conduct to sign upon my arrival, I was also told that a violation of this was
7 the only way I would be removed from the team. I was given a 15% athletic scholarship as well
8 for my first year that would decrease to 10% the following years. The National Letter of Intent
9 that I signed in my senior year of high school reiterated this, that I would receive this scholarship
10 and was signing on to compete for four years. In addition to this scholarship, I was promised
11 that if I maintained a 3.5 GPA, I would receive a stipend from the SEC as well for each semester
12 and that this would continue for all four years.

13 9. Many of these promises and statements have now become blurry with the *House*
14 *v. NCAA* proposed roster limit of Men's Swimming and Diving teams to 30 spots, and the further
15 announcement of the SEC limiting roster to only 22 spots. I was informed of the roster limits in
16 October by my coach who stated that there would need to be cuts next year.

17 10. Currently, my team holds 28 men with five graduating seniors and two incoming
18 freshmen. This would mean that to meet the standard of 22, three members of my team would
19 need to be cut. My coaches have already been forced to rescind offers to incoming freshmen as
20 the incoming class of 2025 was originally 5 members just a few months ago.

21 11. This also does not account for the transfer portal. Programs like the University
22 of Florida and University of Auburn have many more athletes than the proposed limit and would
23 need to make heavy cuts in order to remain compliant. A program like Florida, who is
24 consistently within the top five at the NCAA Championship Meet, would have many athletes
25 that could easily transfer to a less renowned program and take a spot from someone who was on
26 the team the year prior. Essentially, members cut from top SEC teams can transfer to lower
27 teams within the conference, causing a dramatic shift in athletes being forced out of the
28 conference to make room on the roster.

1 12. This has definitely taken a mental toll on the team. Many of us are already
2 starting to consider what our options will be if we are cut from the roster. Within the team,
3 people have begun comparing themselves to each other far more often, trying to determine if
4 they will be cut or be able to remain on the team. This is already an extremely mental sport,
5 with many members of the team seeking mental health resources through the University. I
6 personally have sessions with both a sports psychologist and a therapist. Most of what my
7 conversation has been with them lately is surrounding these roster cuts.

8 13. Much of this stress is due to what I may lose if I am cut from the team. For one,
9 I would lose my ability to remain at a school I love while being able to compete. I would be
10 forced to make the incredibly difficult decision of transferring to continue competing or
11 remaining at the University of Missouri without the sport I've dedicated my life to. If I am cut,
12 the stipend from the SEC as well as my athletic scholarship would likely be revoked. Besides
13 this monetary value, I would lose access to the athlete dining hall, the weight room, the athletic
14 training room, medical care, team gear, equipment, and academic counseling. These are not just
15 perks athletes receive, but necessary in order for us to compete at a high level. We work
16 extremely hard, dedicate countless hours, and give up a lot of our social lives to be able to
17 compete and enjoy these aspects of being an athlete.

18 14. If I am cut, I will be forced to consider transferring or staying at my current
19 University without being on the team. My situation is worse than many due to my scholarships
20 that were not contingent on my competing. I declared my National Merit Finalist Scholarship,
21 as well as a scholarship from my high school, and from Wisconsin Swimming LSC for the
22 University of Missouri. Since they have been declared, I am unable to change what school they
23 will be applied to, and thus the prospect of transferring would be extremely costly in the
24 scholarships I would be forfeiting. I accepted a large academic scholarship at Missouri worth
25 over \$22,000 due to my status as a National Merit Finalist. Many other schools offer similar
26 scholarships; however, they only offer them to incoming freshmen which I would not be.

27 15. Beyond that, I will likely be slowed down in my degree process and may have to
28 take an extra semester if I was to transfer. In addition, the thought of transferring would result

1 in a loss of my entire current social group. Due to the time commitment, it is usually difficult
2 for athletes to form friendships with people outside of the athletic department. I spend so much
3 time with my teammates that they are my strongest connections. If I transferred, I would lose
4 these friendships. However, if I remained here, I would still have strained relationships with
5 those able to remain on the team. If I am cut, regardless of whether I transfer or stay, it would
6 have a dramatic effect on my social life and mental health.

7 16. I ask that roster limits are not enacted in fall of 2025. At minimum they should
8 be delayed until fall of 2028. Imposing a sudden limit to 22 or even 30 spots is drastic, with
9 almost a third of current teams being affected. Those that are affected committed and signed to
10 schools with the expectation of being able to compete and be a member of the roster for four
11 years. It is unfair and unjust for us to be punished for something we had nothing to do with.

12 17. If the roster limits are delayed until 2028, it will allow all athletes that signed
13 under the previous circumstances to keep what we were promised and signed for. Programs can
14 be careful with their recruiting and slowly taper their teams' rosters down, so that by the time
15 the last affected class graduates, they are down to 30 or 22 roster spots. This is the best
16 compromise I have been able to think of, allowing the NCAA and SEC to still do what they feel
17 is necessary while protecting college sports and the athletes who made decisions based on things
18 previously set in stone.

19 I declare under penalty of perjury that the foregoing is true and correct.

20 Dated: Columbia, Missouri

21 January 24, 2025



Anakin Fischer
NCAA ECID No.2107283735
901 Hitt St,
Columbia, MO 65201

Carly Frank
76 Beverly Road
Montclair, NJ 07043

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Carly Frank. I am a current Division I athlete at the College of William & Mary and my NCAA ECID number is 2206584719. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Carly Frank

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
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8 **DECLARATION OF CARLY FRANK**

9 I, Carly Frank, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman at the College of William & Mary and am a member of the
11 NCAA Division I Men's and Women's Swim Team. I am a member of the Injunctive Relief
12 Settlement Class and object both individually and on behalf of the class.

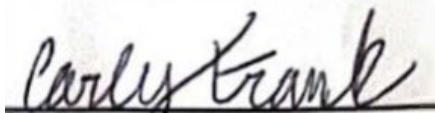
13 2. Our coaches have explained to us that roster limits if implemented, will cause our
14 team to incur and suffer from cuts of four of our teammates. We do not yet know if these will be
15 athletes currently on our team, incoming freshmen, or a combination. This would be devastating to
16 both the swimmers' commitment to the program and the coaches who committed to us when we
17 declared intent to attend William and Mary. Before I verbally committed to William and Mary, I had
18 five official visits scheduled to other schools the fall of my senior year of highschool. By verbally
19 committing to William and Mary, I gave up the opportunities to visit these schools, four of which I
20 was confident to get offered a spot on the team, and terminate my recruiting process. This was not
21 an easy decision, especially considering I spent over a year talking to coaches and visiting schools
22 searching for my best opportunity. When I had the rest of my current teammates committed to
23 William and Mary it was under the conditions we would be offered an actively competing roster
24 spot. If the roster limits are put in place for swimmers on the William and Mary Women's team will
25 have their conditions of commitment violated by being cut from the program. This would be a
26 devastating loss to the program and an irreplaceable loss of opportunities to those swimmers. We do
27 not want this and feel we should not have to worry about losing teammates or have any concerns
28 surrounding our own position on the team. Added stress does not help performance or team spirit.

1 Nor will a limited roster benefit our team.

2 3. We function as a team in and out of the pool. We eat together, study together, relax
3 together, and live together; we have strong mentoring systems on our team and pride ourselves on
4 helping one another in and out of the pool; we are a tight, supportive group. The motto for William
5 and Mary is "tribe" and no one on our campus takes that more seriously than the swim team. This
6 program demonstrates exactly what college Division I sports should be about. Learning how to
7 improve through both hard work and critical thinking, developing better athletes and people, and
8 becoming a part of something bigger than ourselves. We are a team. We win, lose, grow, and fight
9 together not individually. Losing any member would go against who we are and what college
10 athletics should prioritize. We worked incredibly hard throughout high school in order to have this
11 opportunity; we all want to remain on this team and at our school, together. I have not even completed
12 my freshman year and I can already see how four years on this team would transform who I am as a
13 person and prepare me for life after school. I hope I have the opportunity to experience this. It would
14 be unfair to rob any swimmer the ability to fully develop as athletes and team leaders.

15 I declare under penalty of perjury that the foregoing is true and correct.

16
17 Dated: Williamsburg, VA
18 January 27, 2025



19 Carly Frank
20 NCAA ECID No. 22065847194
21 76 Beverly Road,
22 Montclair, NJ 07043
23
24
25
26
27
28

Jordan O. Freer
5660 Petersen Lane,
Lotus, CA 95651

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Jordan Freer. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 2207609092. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Jordan O. Freer

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF JORDAN FREER**

9 I, Jordan Freer, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a senior at the University of Washington and am a member of the NCAA
11 Division I women's rowing team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 2. I was not a rower in high school; instead, I swam for fourteen years and played
14 water polo in high school. I am from an extremely small town in Northern California, with a
15 population of less than 250 people. To go to school and compete in sports, we had to drive 30
16 minutes to the next largest small town. In high school, I swam for both a year-round club team
17 and my high school team, as well as playing water polo. In the fall, during water polo season, I
18 would go straight from my last class to water polo practice, which would last 90-120'. Practice
19 was at a neighboring high school, because my own school's was not big enough to practice in.
20 As soon as practice finished I would get out of that pool and drive 15 minutes to a different one
21 for my club swim practice, which was two hours. I stored boxes of granola bars and dried fruit
22 in the back of my car to eat during the drive in between, and the seat of my car never dried from
23 where I sat in my wet suit between practices. Once swim practice ended and I'd stayed behind to
24 put the covers on the pool and put away kickboards and buoys, I'd drive the 30 minutes home
25 and hope there was still dinner left out in the kitchen at 9pm. I'd eat while starting my homework,
26 often not going to bed until midnight or later because of assignments that needed to be finished
27 by the next morning. During the high school swim and water polo seasons, when I doubled those
28 sports on top of club swimming, I spent at least 15 hours, often closer to 20, in practices - without

1 even including the driving time. I had no social life outside of sport. I never slept. Even then, I
2 had little chance of making a college athletics team. With absolutely no resources to assist me in
3 the recruiting process, no advice or support, and no knowledge of any of the steps to take, D 1
4 was out of reach for me. I firmly believe that roster caps will further exacerbate the difficulty for
5 high school athletes like me, doing their best to be independently recruited, to be chosen to join
6 collegiate athletics programs. There will be no room to take a chance on someone - someone
7 who could be incredible.

8 3. My freshman year of college, I attended UC Santa Barbara, where I walked onto
9 the club rowing team after missing the chance to swim as a Gaucho. Within my first quarter of
10 being on the team, I had put up erg times that were faster than almost every varsity rower. UCSB
11 Rowing has a policy of not allowing any novice rowers without previous experience to join the
12 varsity squad, so I continued to train with the novice team under a first-year coach who did not
13 have the knowledge, leadership, or technical ability to be remotely competent. He would be fired
14 within the next year. While the entire squad struggled on the water and placed poorly in almost
15 every event, I did additional erg workouts on my own or with one other athlete, and by the end
16 of the year I had a 2k and 6k time that were extremely positive for my experience level.

17 4. A varsity rower at UCSB told me at the end of that first year that my erg times
18 were well within the range that D 1 college coaches would be excited to see. Though skeptical, I
19 had nothing to lose by looking into it, so that summer I sent emails to about eight West Coast
20 schools with D1 women's rowing programs. I wasn't sure what I was looking for in a school or
21 team, or what kind of offers I should be expecting to get based on my times. I had gone from
22 barely knowing this sport existed to having schools fly me out to visit their campuses - I was
23 shell-shocked. I also had very little time to make my decision, as it was already mid-summer
24 when everything began. As I whittled away at the short list of schools I could go to, it became
25 clear that I was going to attend UC Berkeley or the University of Washington. I remember a
26 message I received from Coach Yaz during that process, that has stuck with me to this day:
27 "Jordan, don't underestimate yourself. We believe in you. Come to Washington." That message
28 changed my life. How many fewer people will get to be believed in in that manner if these

1 roster caps go into effect? How many people just like me may never have the opportunity I
2 was so fortunate to have? I remember very clearly a moment from my visit to Washington,
3 standing outside of the boathouse and looking at the stadium. I knew it was where I belonged.
4 There was no concrete reason - Berkeley made more sense in every possible logical regard.
5 My dad is a disabled veteran, meaning that I do not pay tuition at any California UC or CSU
6 school. I would have been closer to my family, closer to my long-distance partner, closer to the
7 mountains and rivers and ocean that I love, closer to my brothers' sports games and my mom's
8 plays. I went to Washington on a feeling, not a logical decision, and I haven't regretted it a
9 second - but without Washington Rowing, I certainly would. When people ask me if I
10 like Seattle, if I like Washington, if I like UW, my answer is always the same: "I love the
11 team and that is why I am here. That is enough." How many fewer people will not have the
12 chance to love and value and cherish their experience as a part of a D 1 rowing program so
13 much that it supersedes ever possible logical opposition to their college experience?

14 5. Our head coach called a team meeting a little over a week ago to discuss the
15 proposed roster caps and how they would impact our team. She did so from a place of empathy
16 and kindness to all of us, to give us time to consider our options from now until December so
17 as not to blindside us. We have been told that our coaches intend to keep our team as large as
18 possible until the last second before the maximum size must be reached, and that doing so will
19 require us to sacrifice all of our fall racing opportunities, so as to give as much time as possible
20 to set the roster.

21 6. I've never heard the team as quiet as it was walking out of that meeting. There
22 would have normally been chatter about weekend plans, speculation about the launch time
23 for the following morning, laments of assignments due and sore legs and the need for a sweet
24 treat to end the night. Last Friday, though - the team was quiet. People walked out in little
25 knots of housemates, shoulders slumped and backs twisted and hunched around this little knife
26 slipped so quietly through the fabric of our team and between the ribs of our sisters. They
27 weren't wondering what time we'd have to wake up tomorrow - they were wondering how
28 many more times they would get to set their alarms for the crack of dawn for the privilege of

1 pulling this team. It was devastating to watch. People were openly sobbing - some not even
2 those at risk of being cut, but who knew the devastating impact this would have on our team as
3 a whole. I have the privilege of being one of two commodores of the Women of Washington
4 this year, meaning I am a link between the psyche of the team and the coaches and vice
5 versa. The sadness and devastation from both sides was abundantly clear that night and
6 every day since. Make no mistake, this is a devastation of our team. This is sisters torn from
7 sisters, teammates ripped from team, a family torn apart. This is an execution of hopes and
8 dreams. This is a decision that was made for us with massive implications, with no
9 consideration given to us. The freshmen come to me with worries about their beautiful little
10 atmosphere of support and uplifting each other curdling in the vinegar of fighting for a spot
11 on the team. The juniors who have nearly finished their degrees, who have built lives here
12 counting on this team, who love rowing and each other are shattered at the thought of losing
13 everything. This is absolutely taking a mental toll on every single member of this team. We need
14 to focus, to study and to train, but people are instead having to draw contingency plans and weigh
15 their values against their odds.

16 7. If cut, I would lose a great deal of my personal identity and my life. I rowed for
17 the USA on the U23 National Team this summer. Losing my spot on this team would decimate
18 any dreams of continuing to compete after college. I would lose my friends. I would lose my
19 place in the world. I would lose scholarship money that allows me to attend an out-of-state
20 school, meaning I would lose my chance to finish my degree. I would lose all of my resources -
21 mental health, physical health treatment, academic counseling, tutoring, academic financial aid,
22 my meal plan, medical insurance, almost all of the food I eat. I have been a competitive athlete
23 my entire life. I would lose who I am.

24 8. I truly cannot fathom the implications this will have for athletes who are forced
25 out of their program as a result of the roster cuts. I elected to transfer from my previous school
26 and team, and even that was a devastatingly difficult decision with implications I still grieve.
27 Having that autonomy stripped from those who won't have a choice of whether or not to remain
28 on the team is simply cruel. This team is a family. With a roster of over 100 athletes this year,

1 we are still truly, deeply, a family. The opportunity to love so many people so deeply is a chance
2 that is not found frequently. There is no upside to the roster cap - no sensible notion that with
3 less people we will be able to be closer-knit, more deeply interconnected, a stronger unit. We are
4 all of these things to an even higher degree with the magnitude of our team. Our size strengthens
5 us, gives us the opportunity to love so many people, to have an infinite well of strength and
6 support at our backs, to learn from and be buoyed by the courage and knowledge and power of
7 these people we have the privilege of being on a team with. The strength of the dog is the pack;
8 to cut our sisters from our sides is to hobble us and to leave us bleeding and mutilated.
9 Additionally, my transfer decimated my academic prognosis. I came into college with nearly
10 two year's worth of credits from AP classes, but after my transfer it became nearly impossible
11 for me to graduate without taking a fifth year. I took classes at UW that were exactly the same
12 as those I'd taken at UCSB because the credits weren't accepted the same way. Not only is this a
13 waste of my time, it is expensive -especially when paying out-of-state tuition. Athletes who can't
14 afford to transfer to out-of-state schools will have their options severely limited. Transferring
15 was an extremely, extremely difficult decision for me, and if people lose a huge amount of
16 autonomy in that choice; if they have to choose between the sport they love and the school they
17 attend; it will have extreme consequences for a great many athletes.

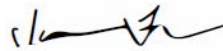
18 9. This team is everything to me. Four years ago, I barely knew the sport of rowing
19 existed. Athletes enter collegiate rowing from millions of different backgrounds and experience
20 levels. Those who succeed in rowing often are not those with some natural, innate talent that
21 shines through on day 1. They are those who are gritty, tenacious, and willing to stand up over
22 and over again in the face of failure and setback. More often than not, these athletes - these people
23 whose driving merit is their perseverance - will not be the best or the fastest on day 1. Nor will
24 they be on day 2, day 3, or day 45, when - depending on the first day of the school year - their
25 fate on the team would be decided. There are so many incredible athletes who will lose their
26 opportunity entirely to compete in this sport. I went to the USA Under 23 National Team
27 Selection Camp this year with Grace Vander Griend, my teammate of two years. She had
28 walked onto the team with no rowing experience her freshman year at UW. If cuts were made

1 on December 1, she may not have made the team. Two years later, we raced for a
2 national championship together and became part of the second fastest 2V boat in the country.
3 The next year we contended again, and that summer went on to trial for Team USA U23.
4 There are so many stories like hers and like mine - people who would not have made it onto a
5 smaller team. People who need time to grow and to work for their development. People who
6 end up being great. The proposed NCAA roster caps will devastate an incredible number of
7 young female athletes who just need a chance to be exceptional.

8
9 I declare under penalty of perjury that the foregoing is true and correct.

10 Dated: Seattle/King County, WA

11 January 26, 2025

12
13 

14 _____
15 Jordan O. Freer
16 NCAA ECID No.2207609092
17 5660 Petersen Lane
18 Lotus, CA 95651
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Julia J. Gehrig
601 Robmont Rd
Charlotte, NC 28270

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Julia J. Gehrig. I am a current Division I athlete at the College of William & Mary and my NCAA ECID number is 2105159377. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Julia J. Gehrig

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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8 **DECLARATION OF JULIA J. GEHRIG**

9 I, Julia J. Gehrig, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a Sophomore at the College of William & Mary and am a member of the
11 NCAA Division I Women's Swim Team. I am a member of the Injunctive Relief Settlement
12 Class and object both individually and on behalf of the class.

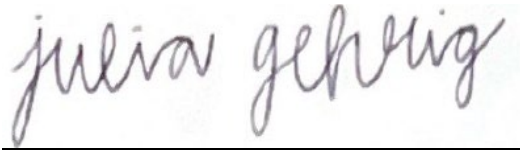
13 2. Our coaches have explained to us that roster limits if implemented, will cause our
14 team to incur and suffer from cuts of four of our teammates. We do not yet know if these will be
15 athletes currently on our team, incoming freshmen, or a combination. We do not want this and feel
16 we should not have to worry about losing teammates or have any concerns surrounding our own
17 position on the team. Added stress does not help performance or team spirit. Nor will a limited roster
18 benefit our team.

19 3. We function as a team in and out of the pool. We eat together, study together, relax
20 together, and live together; we have strong mentoring systems on our team and pride ourselves on
21 helping one another in and out of the pool; we are a tight, supportive group. We worked incredibly
22 hard throughout high school in order to have this opportunity; we all want to remain on this team
23 and at our school, together. We do not feel roster limits help our team or our sport, but they will
24 negatively impact those who are cut and our team at large.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Dated: Williamsburg, VA

3 January 28, 2025

4 

5 _____
6 Julia J. Gehrig
7 NCAA ECID No. 2105159377
8 601 Robmont Rd
9 Charlotte, NC 28270
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Daniel Gordon
5505 East Berlin Road
East Berlin, PA 17136

January 16, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Daniel Gordon. I am a current Division I athlete at the University of Florida and my NCAA ECID number is 2011963657. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2024.

Sincerely,
Daniel Gordon

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF DANIEL GORDON**

9 I, Daniel Gordon, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a junior and swimmer at the University of Florida. I am a member of the
11 Injunctive Relief Settlement Class and object individually and on behalf of the class.

12 2. I started competitive swimming when I was 9 years old. I have mostly competed
13 in the 50-yard and 100-yard freestyle events. In high school, I qualified twice for Summer Junior
14 Nationals. My first time there was the summer after my junior year. Earlier that year, I recorded
15 one of the top 50-yard freestyle times in the country for the U16 division at the time. I was also
16 a four-time Pennsylvania 3A State Championship finalist and two-time Champion. More
17 recently, I participated in the Olympic Trials for the Irish national team.

18 3. I started getting significant college recruiting attention during the summer prior
19 to my junior year. All in all, I had some level of interest from about 45 Division I schools. I
20 ultimately chose Florida because of its elite swimming program and my interest in its mechanical
21 engineering program. I passed on several full scholarships for this reason.

22 4. Unfortunately, prior to arriving for my freshman season, I suffered a severe fall
23 during a training session. I broke my L2 vertebrae and several bones in my foot. As a result, I
24 spent most of my freshman year recovering from these injuries. A subsequent weightlifting
25 injury during that season further delayed my return. I was not able to do flip turns or starts in
26 the pool for several months and it impacted my performance at meets that year.

27 5. When I returned for my sophomore year, my coaches felt that they had rushed
28 my recovery the previous year. As a result, I spent most of that season practicing with the mid-

1 distance group, instead of with my sprint group. I did not have the opportunity to compete in a
2 meaningful way at any meets that season. At the end of the season, I was entered into a meet
3 (considered my taper meet) where I was the only male swimmer in my event.

4 6. Needless to say, I was really looking forward to finally having a normal season
5 this year and the opportunity to compete in the sport that I love. However, last month, my entire
6 team was gathered for a meeting with an athletic administrator from the school. She informed
7 us that due to roster limits included in the settlement, the swimming program would undoubtedly
8 be undergoing roster cuts.

9 7. Later, I was called in for a meeting with two of my coaches. I was told that I
10 will not have a spot on the team next year because of the roster cuts. My coach informed me
11 that I could choose between entering the transfer portal or quitting the team mid-season. There
12 was no option to continue attending practices and meets for the remainder of the season if I did
13 not intend to transfer. They said there was no point in me racing unless I needed to show the
14 results to other collegiate swimming programs. They thought the team dynamic would suffer if
15 all swimmers didn't have the same reasons for showing up every day. I am passionate about
16 swimming, but there are no good options to pursue it.

17 8. I've dedicated so many years of my life to the collegiate level in swimming and
18 my family and I made a lot of sacrifices, both financially and timewise. Now, it feels as if my
19 journey is over before I've even had a chance to show what I can do. I wanted my parents to be
20 able to watch me swim again at a meet this year, which is also no longer possible.

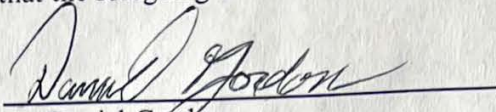
21 9. In addition to the emotional impact of this forced decision, the benefits I receive
22 through my spot on the swim team may be at risk. I turned down several more financially
23 lucrative scholarships to join the program at Florida, due to its strong engineering program as
24 well as the swim team. In order to do so, I have relied on benefits like free meals for athletes
25 and a subsidy of my cost of attendance by the athletic department. It is still unclear how the
26 settlement and associated roster limits will affect my benefits. This has caused further anxiety
27 for my family and me.

28 10. The NCAA is meant to protect student-athletes like me and allow us the

1 opportunity to compete in the sports we love. But nobody is looking out for us. The roster limits
2 steal our ability to continue competing and should not be approved.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Dated: East Berlin, Pennsylvania
5 January 20, 2025


Daniel Gordon
NCAA ECID No. 2011963657
5505 East Berlin Road
East Berlin, PA, 17316

Alexandria Grasso
2 Barberry Rd
North Reading, MA 01864

January 15, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Alexandria Grasso. I am a current Division I athlete at the University of Massachusetts, Lowell and my NCAA ECID number is 19086656264. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Alexandria Grasso

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF ALEXANDRIA GRASSO**

9 I, Alexandria Grasso, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a graduate student at the University of Massachusetts, Lowell. I run on the
11 Division I track and field team. I am a member of the Injunctive Relief Settlement Class and
12 object on behalf of the class.

13 2. When I arrived on UMass Lowell's campus as a freshman during the height of
14 the COVID-19 pandemic, everything felt uncertain. I didn't know many people and restrictions
15 made it very difficult to make friends. The track and field team became my whole world. They
16 weren't just teammates. They were my support system and the reason I got through that
17 challenging time.

18 3. One of the best parts about being on a big team that year was how many different
19 kinds of people I had to connect with and look up to. We had athletes from every background
20 and event group: jumpers, sprinters, throwers, distance runners, and more. Each of them had
21 their own story, their own advice, and their own way of approaching the sport. Whether it was
22 learning how to manage my time, hearing how someone came back from an injury, or just
23 watching older athletes handle the ups and downs of competition, I gained so much from being
24 around them. If roster limits had been in place, the size and diversity of the team would have
25 been so much smaller, and I would have missed out on those connections and lessons.

26 4. One of those teammates is someone who has become one of my closest friends.
27 She tore her ACL right before signing, but our coaches still took a chance on her and gave her a
28 spot on the team. If these proposed roster limits had been in place, she might not have gotten that

1 opportunity. Today, she has grown into a phenomenal athlete and someone I look forward to
2 training with every day. Stories like hers show why having room for development and second
3 chances is so important.

4 5. Track and field is special because it's for everyone. We all come together to make
5 one big team. Roster limits would change that. Entire event groups could be cut, and athletes
6 who might not be the top recruits but have tons of potential wouldn't get the chance to develop.
7 It would change the whole dynamic of what makes track and field so unique. For me and so
8 many of my teammates, track and field is about more than winning or setting records. It's about
9 the relationships we've built, the lessons we've learned, and the sense of community we've
10 found. Losing these opportunities for future athletes would be devastating.

11 6. The NCAA settlement may have been created with good intentions, but the
12 proposed roster limits would do more harm than good. I urge decision-makers to consider the
13 stories of athletes like me, my friend, and so many others who've found a home in this sport.
14 Roster limits would not only take away life-changing opportunities but also hurt the foundation
15 of collegiate track and field. Please protect what makes this sport so special. Not just for us, but
16 for the athletes who come after us.

17 I declare under penalty of perjury that the foregoing is true and correct.

18 Lowell, Massachusetts
19 January 15, 2025

20 

21 Alexandria Grasso

22 NCAA ECID No. 19086656264

23 [Mailing Address]

24 2 Barberrry Rd

25 North Reading, MA 01864
26
27
28

Katherine R. Guenther
821 Mt. Vernon Avenue
Charlotte, NC 28203

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Katherine R. Guenther. I am a high school student aspiring to be a future Division I athlete, and a member of the Injunctive Relief Class. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Katherine R. Guenther

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF KATHERINE R. GUENTHER

I, Katherine R. Guenther, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am 15 years old and am in 10th grade at Myers Park High School in Charlotte, NC. I have been competing as a swimmer since I was 7 years old and hope to compete on a Division I college team.

2. I understand that the settlement in this lawsuit will govern NCAA Division I sports for the next decade, which is when I will be in college. I therefore am a class member who could be affected by the terms of the settlement. I object to the settlement for the reasons stated below, both for myself and for other class members like me.

3. I love the sport of swimming as it provides me joy, discipline, fitness, and personal fulfillment. I swim year-round for my club team, the Aquatic Team of Mecklenburg, as well as for my high school in the winter. I put in 3 hours per day, 6 days per week, of pool time, dryland and weight training in order to maintain my place near the top of my swimming class. I love the competition, friendships, and self-confidence the sport has given me. Furthermore, swimming has allowed me to become a better student and person as I have to juggle these athletic pursuits around a rigorous academic workload. I appreciate what I have and I try to be a role model for the members of my team and for my fellow students.

4. I am a Junior National Championships qualifier in multiple events, ranked in the Top 40 in the country in my recruiting class, and I just attended the 2024 Girls National Select Camp in Colorado Springs, CO, a stepping stone for many junior swimmers on their way to Division I universities and beyond. I also maintain straight A's in the classroom.


5. My family has been an inspiration to me as my father was an All-American swimmer at UNC-Chapel Hill, my oldest brother followed in his footsteps to UNC, and my other brother is also a competitive high school swimmer. My parents preach the benefits of the sport, but also want to make sure we love what we do. I would not do this without their love and support, and I would not sacrifice time and energy needed if I did not love the sport of swimming.

6. The limitation of roster spot in collegiate athletics takes away opportunities for young women and men who wish to continue chasing their dreams of individual or team glory, or just the joy of being part of a team dynamic with common goals.

7. There must be logical or economic reasons for wanting to limit collegiate roster spots, but one of the foundational aspects of sport - allowing children to pursue their dreams, regardless of whether they are the best or not – should not be compromised.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 28, 2025

Signed by:

65CE66E0CA4E4C7...
Katherine R. Guenther
821 Mt. Vernon Avenue
Charlotte, NC 28203

Elizabeth Guthrie
4816 Montibello Drive
Charlotte, NC 28226

January 30, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Elizabeth Guthrie. I am a high school student aspiring to be a future Division I athlete, and a member of the Injunctive Relief Class. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Elizabeth Guthrie

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF ELIZABETH GUTHRIE

I, Elizabeth Guthrie, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a high school freshman golfer, and hope to be recruited to compete on a Division I college team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. I practice golf more than 25 hours a week along with going to school during the school year and travel to play tournaments with the goals of playing college golf and going to a great college.

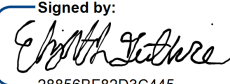
3. I have won Tournaments and had high finishes in many prestigious events.

4. I feel like roster limits are bad in college athletics because it is taking away playing and competition opportunities for student athletes who have worked so hard and sacrificed so much just to play in college.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Charlotte, North Carolina

January 30, 2025

Signed by:


28856BF82D3C445...
Elizabeth Guthrie
4816 Montibello Drive
Charlotte, NC 28226

Ella Hansen
5825 Longview Rd.
Shawnee, KS 66218

January 25, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Ella Hansen. I am a current Division I athlete at the University of Missouri and my NCAA ECID number is 2209670046. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Ella Hansen

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF ELLA HANSEN

I, Ella Hansen, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a freshman at the University of Missouri and am a member of the NCAA Division I Women's Swim Team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. As a 3x state champ, a Junior National qualifier, and a U.S. Open qualifier comes with a lot of practices including: Swimming, dry land, and weightlifting. This also include sacrifices like having to miss other activities or social events.

3. My recruiting process started later than others, since I got my Junior National cut my junior year of High School. Getting that cut opened the door for swimming at the Division I level. I got a call from the coaches at the University of Missouri and they offered me a visit. Once I stepped foot on campus, I knew I was going to call this place home. I looked at plenty of other schools but nothing compared to the University of Missouri. The team felt like instant family, and I knew I wanted to be part of it instantly. I could tell the coaching staff cared for each athlete not only as a swimmer but as a person.

4. I heard about roster limits after I signed with The University of Missouri. My club coach mentioned it, but he had said it probably won't affect my roster spot. Since then, however, my teammates and I fear that there will be a chance we get cut. Many teams in the Southeastern Conference want to make space on teams for possible

1 transfers, leading to potential cuts on the team in addition to the roster limits.
2 My understanding of this proposed settlement is that there will only be 30 spots
3 starting in the 2025 fall season because of the roster limits. Next year the women's
4 team will be under 30, but my spot could still be at risk with the potential of transfers.

5 5. These roster limits are taking a huge mental toll on not only swimmers, but
6 many athletes in other sports. Knowing that this could be the last normal season
7 with my teammates and last normal year with this team is stressful. Swimming is
8 already a very mental sport, and adding the uncertainty of potential roster limits is
9 bringing on a lot of unwanted stress on athletes.

10 6. If cut, I would lose several benefits of being a member of this team, such as
11 financial aid and award money, tutoring, academic counseling, meal plan, athlete-only
12 dining, athletic medical insurance, and my housing lease for next year.

13 7. If I am told that my spot is at risk, I could try to enter the transfer portal.
14 However, once you enter the transfer portal, your athletic scholarship is revoked. If
15 one is in the portal but can stay on the team, then one has to negotiate a whole new
16 scholarship agreement with the coaches. The process for athletes and coaches is not
17 easy. These roster limits and additional transfers are going to affect the team
18 dynamic significantly. The culture that this team and our coaches have crafted is truly
19 something special. That team camaraderie is something that is built over time and is at
20 risk with these roster limits.

21 8. I think roster limits should be gradually phased in by fall of 2029 so the
22 coaches have until then to plan how many kids they need for each class year. If we
23 signed an National Letter of Intent back in November of 2023 or 2024, we should be
24 considered grandfathered in.
25
26

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Columbia, Missouri

January 25, 2025

Signed by:

Ella Hansen

100949E56B7B473...

Ella Hansen

NCAA ECID No. 2209670046

5825 Longview Rd.

Shawnee, KS 66218

David Hatt
201 Wire Rd.
Auburn, AL 36849
Aubie Hall, Apt. 324C

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is David Hatt. I am a current Division I athlete at Auburn University and my NCAA ECID number is 2206593670. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
David Hatt

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF DAVID HATT

I, David Hatt, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a freshman at Auburn University and a member of the NCAA Division I Men's Swim and Dive team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. When I was in middle and high school, I participated in the Nebraska Diving Club, and I practiced for three hours a day during school and six during the summers. I also competed in NSAA high-school level diving in which I had to practice for an extra two hours late at night from 7:30-9:30, making it roughly 5 hours of practice daily from November to February. On top of this, I lifted weights early in the morning and pushed myself to become the best diver in the state of Nebraska. I regularly travelled all over the United States to compete in USA Diving meets to put myself out there as a relevant athlete. I went to training camps with famous coaches to get as much wisdom as I could from them because I wanted to make an electric impression at my last few club meets. I did all of these things in order to build my resume so I could have a better chance of getting into a prestigious program and open enormous opportunity for myself.

3. I love musical theater and playing piano, but I chose to largely forgo those activities in high school to focus on my sport. I missed several productions I would have loved to be a part of, and I never got to be in band because my athletics would not allow for it. I missed out on hanging out with friends on Friday nights because I had practice, and I had to wake up early for morning practice on Saturdays. Out of the many opportunities I had, I chose this sport

1 as the avenue for my future success.

2 4. I am the 2023 and 2024 Nebraska State men's diving champion, I am a four-time
3 Heartland Athletic Conference champion, I am a four-time National High School All American,
4 I am a four-time letterman, I was in the top 25 Athletes at USA Diving Nationals on the platform
5 event in 2023, and I was coached in my earliest years of diving by the well-respected Hoffman
6 family, who gave me an incredible foundational skill set. These achievements attracted the
7 interest of my several prospective coaches and show that I belong at a Division I program.

8 5. My recruiting experience was incredible. I met the most prestigious coaches and
9 programs in the United States, not because of my exceptional skill at the time, but because of
10 my exceptional attitude and work ethic. I attended a training camp called "2028 and Beyond"
11 where I met the U.S. Olympic coach Drew Johansen. He took an interest in my desire to make
12 corrections and my coachability. I learned a lot from him at that camp and more importantly got
13 his contact and secured his interest. I also met John Fox, who at the time was the head coach of
14 the hosting club. He connected me with Ted Hautau at the University of Kentucky. Coach Fox
15 later became the head coach at Auburn University, and he certainly did not forget my attitude
16 and work ethic at his camp.

17 6. I took visits to Florida State University, Indiana University, University of
18 Kentucky, and Auburn University. I was looking for a school that had a good platform diving
19 facility, could offer me some scholarship money, had a good Catholic community, a beautiful
20 campus, a film program, and a coach that I respected. For a number of reasons, I was not at home
21 at FSU or IU, so that left me with UK and AU as options.

22 7. I felt guided by the Lord when I made my decision to come to Auburn. It was my
23 last recruiting trip, and we were about to go to the football game. I talked it over with my mother
24 (who is also my high school dive coach) and we both agreed that this school checks all the boxes.
25 I committed on the spot while we were eating dinner and surprised the heck out of my coach. I
26 am receiving athletic as well as academic scholarships, and my coach promised me a spot and
27 the right to compete the following year. He said no meets would have roster limitations, unlike
28 Indiana. He made it clear that he wanted Auburn to be my home for the next four years by

1 showing me the plan he had for each diver's progression and training cycles. I'm afraid that I
2 won't get to complete the progression laid out for me and my potentially successful career will
3 be cut off prematurely. I turned down other offers because I wanted to dive and thrive at Auburn
4 University. This is my new home. I have friends in my church and friends on my team that I will
5 potentially have to leave because of this movement.

6 8. Within the first couple of weeks of diving, Coach Fox gathered us around and
7 said he had some important news. This was the very day after the initial release of the roster
8 limits. He seemed flustered and not sure exactly how to communicate this reality to us, but he
9 was and is determined to be completely transparent with the whole team about every new thing
10 he hears. I felt my stomach drop when he told me. I realized that now I not only have to work
11 hard to be a great diver, earn the respect of my teammates, make friends, and get good grades,
12 but now I must fight for my life to stay on this team and remain in my new home. I quickly did
13 the math in my head and realized that with four available spots, an upperclassman, and two
14 incoming freshmen, there is effectively one spot that five of us are fighting for. I would give
15 nearly anything for a better chance to stay on this team.

16 9. This has been incredibly stressful for me this year. Multiple times I would have
17 days when I would despair because of the seeming hopelessness of my situation. It was
18 sometimes hard for me to muster that characteristic work ethic because of the pressure to be
19 perfect immediately. While I've made some fantastic improvements this year, I have also stalled
20 out several times because of the nature of my sport. In diving, you must make precise, minute
21 corrections to your form that can easily take months to ingrain. Becoming a new diver takes time
22 and time is not something I have. This means that on a day-to-day basis I have had to grapple
23 with the enormous pressure to level up and prove that I deserve to stay, and the inherent patience
24 that diving requires. This has eaten me up and been an enormous source of stress, pressure, and
25 discontent.

26 10. It has been my dream to go somewhere far away from home and be an
27 independent young man pursuing greatness. Were I removed from this team, I would be forced
28 to return home and attend a local school. Without the financial support and privileges I get at

1 Auburn, including but not limited to scholarship, nutrition, medical insurance, academic
2 counseling, clothing, priority registration, free event passes, travel expenses, beautiful facilities,
3 personal training staff, and a personal purpose, it would not be financially feasible or sensible
4 for me to attend this amazing school. Personally, I don't think I could bear to stay here and, while
5 watching my friends continue, sit out of diving.

6 11. As a result of these roster limits, I may quit my sport. After having participated
7 in such a prestigious and elite program, I may only find disappointment elsewhere. In order to
8 continue diving, I would have to enter the transfer portal and hope that I can make the roster of
9 another Division I program which will be difficult considering that thousands of athletes are
10 being displaced. If I can't, I would be forced to go Division II, and I would rather quit. If I quit,
11 I would be forced to attend a local university in Nebraska and live at home while I do my studies.
12 My dream was to go far away from home and pursue excellence at diving and Auburn gave me
13 that chance. It's a shame that it may be taken from me. I will also have to break off many
14 friendships that I have formed this year because, living half a continent away from them, it will
15 be difficult to maintain them.

16 12. I think that roster limits are ruining amateurism in college athletics. I think that
17 making this change so suddenly is inconsiderate to all the young athletes whose careers and
18 dreams are being squashed. It's clear to me that the recent movements of the NCAA concerning
19 NIL and now roster limits have not been in the best interest of the athletes, but rather in their
20 own financial interests. I think that if this must be implemented, it would be prudent to give
21 universities a 5- or 6-year timeframe to reach the expected limit. This way both incoming classes
22 and current freshmen have a chance at living their dreams and not having them suddenly ruined.
23 Ideally, however, I feel that this should never go through, and we should preserve amateurism
24 in college athletics.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Auburn, Alabama

January 28, 2025

Signed by:


0DE4F800B6CD5410...

David Hatt

NCAA ECID No. 2206593670

201 Wire Rd.

Aubie Hall, Apt. 324C

Auburn, AL 36849

Tim Havlick
621 Custer Ave.
Colorado Springs, CO 80903

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Tim Havlick. I am a high school student aspiring to be a future Division I athlete, and a member of the Injunctive Relief Class. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Tim Havlick

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF TIM HAVLICK**

9 I, Tim Havlick, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a high school junior and swimmer, with a goal to be recruited to compete on
11 a Division I college team. I am a member of the Injunctive Relief Settlement Class and object
12 both individually and on behalf of the class.

13 2. I have been swimming competitively and practicing on a year-round basis for
14 more than five years. In an average week I swim 8-10 hours, do dryland training (weights and
15 stretching) for an additional 2-3 hours weekly, and usually swim 15 or more miles. Training
16 requires a lot of sacrifice, time, energy, and expense, including fitting this in on top of my high
17 school commitments and other demands on my time such as playing trombone in the Colorado
18 Springs Youth Orchestra and working at the local YMCA as a lifeguard.

19 3. I hope to continue to improve as a swimmer to attract the interest of collegiate
20 coaches. As a freshman and sophomore in high school I qualified for the Colorado State High
21 School Boys Swimming Championships (4A) as a member of 200 medley and 200 and 400 free
22 relay teams, and was less than 0.5 seconds off state cuts in the individual 50 free and 100 breast.
23 I am aiming to qualify individually for the state meet in both these events in 2025, as well as the
24 100 fly and 200 IM. By 2026, my goal is to make the finals in one or more of these individual
25 events.

26 4. I have not yet started the college recruiting process, but have learned from the
27 experience of my older sister who is currently running at the Division I level for a Power 4
28 university (she did not feel comfortable submitting an objection, but is actively concerned about

1 the proposed roster limits and how that will affect her standing on the team).

2 5. I learned about the proposed roster limits from my parents and sister, who was
3 informed of the proposed limits by her teammates and, later, her team coaches. My swim coaches
4 have not mentioned anything about roster limits and my impression is that even though many of
5 my teammates hope to swim in college, there has been little communication about roster limits
6 shared with high school-aged athletes.

7 6. The prospect of roster limits makes the already-stressful process of planning for
8 college even more challenging, as D1 roster spots are likely to become more scarce.

9 7. Since I am still in high school, I can only imagine what prospective benefits I
10 would lose by not being on a team due to roster cuts. From my sister's experience, the
11 hypotheticals seem very real, and many of these impacts would affect myself and our whole
12 family: She faces the loss of a wide array of benefits she currently has as a D1 athlete. Some of
13 these are financial, such as scholarship aid, *Alston* money, a monthly food stipend, additional
14 money provided for travel meets, and periodic team meals that reduce monthly food costs. Other
15 benefits at risk are academic, including access to athletic tutors, dedicated study spaces, and
16 priority enrollment each semester for scheduling classes. There are health benefits, too, that
17 would be lost including access to athletic trainers, team doctors, MRIs and other tests to detect
18 and respond to injuries, and rehabilitation facilities. Other losses include the loss or disruption
19 of social connections developed as teammates, the elimination of many of the central organizing
20 features of daily/weekly life on campus (such as dry land and weight sessions and daily
21 practices), and the sense of identity as a student-athlete.

22 8. As a high school student, the prospect of roster limits is pressing me to consider
23 a wider range of college possibilities, leading me to question whether or not it's even worth
24 continuing with swimming after high school, despite the fact that I've devoted so much time and
25 energy to swimming for so long! It's not clear to me if there will be a realistic number of rosters
26 spots not just at my top schools, but also at other schools that are likely to be impacted by the
27 trickle-down effects of roster limits.

28 9. I realize that my own position in this case looks to the future, but the concerns

1 seem very real to me. I am less than nine months away from needing to make most or all of my
2 college application decisions and many of these feel very contingent due to the uncertainty over
3 what roster limits could do to the Division I athletics. As I've tried to highlight throughout this
4 letter, the possibility of these caps is also already very much affecting my sister and my family
5 in ways that are disruptive. For current Division I student-athletes, a one- or two-year delay in
6 implementing roster caps could be remedy enough to allow them to compete for the remainder
7 of their college career, but for those of us in high school or younger, clearly this is no remedy at
8 all. I ask you to **eliminate the roster cap provisions** of this settlement in the interest of
9 preserving some of the structure and developmental potential and openness (including walk-on
10 athletes) that currently exist as important aspects of Division I sports.

11 I declare under penalty of perjury that the foregoing is true and correct.

12 Dated: Colorado Springs, Colorado

13 January 26, 2025

14 
15 Tim Havlick
16 621 Custer Ave.
17 Colorado Springs, CO 80903
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28

Olivia Grace Hay
9201 Interlake Ave N,
Seattle, WA 98103

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Olivia Hay. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 1907637117. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Olivia Hay

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF OLIVIA HAY**

9 I, Olivia Hay, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a Senior, Class of 2025, at the University of Washington and am a member
11 of the NCAA Division I women's rowing team. I am a member of the Injunctive Relief
12 Settlement Class and object both individually and on behalf of the class.

13 2. To give myself the opportunity to be a Division 1 student athlete it took an
14 enormous amount of hard work and dedication, training 11-12 times a week through high school
15 for 5+ years before this dream became a reality. Along with this, I faced many setbacks,
16 disappointments and not making boats, but stayed resilient knowing I could keep working hard
17 and one day it would pay off. Along with this, many sacrifices were made like missing
18 family/friends birthdays, Christmas's and weddings but it has all been worth it to compete for
19 my sport that I love so much.

20 3. In high school I won the GU18 4x+ in 2019 at nationals in New Zealand which
21 attracted the interest of some coaches. I gained a trial for the Under 19 NZ rowing team, and
22 then went on to compete in the New Zealand under 21 team in 2021, and the New Zealand under
23 23 team in 2022, and 2023 representing my country in the quadruple sculls and single sculls
24 respectively. Along with this I rowed in UCLA's 1v8 for 2 years, until I transferred schools and
25 was recruited to row at the University of Washington.

26 4. When I was in high school I was interested in finding a school that had a balance
27 of rowing, academics and being in an environment that supported me as a person. I was talking
28 to a lot of coaches from a number of different schools all over the country, and it was important

1 to me to choose the right school as I knew this would shape my life for the next 4 years. Talking
2 to coaches, I was always guaranteed that I would completely change as a person and a rower
3 over the 4 years I was in college, and that my development was incredibly important to them.
4 This was also incredibly important to me, as I have always wanted to return to New Zealand to
5 try and make the Olympics. I originally chose UCLA because when I was in high school, I
6 thought it was everything I needed in a school, I absolutely loved it there, but after 2 years, I
7 wanted to further my development as a rower so transferred to the University of Washington to
8 give myself a better opportunity with rowing. Both schools I have been at have been incredible,
9 and these past 4 years have been the best 4 years of my life. Both schools had made it clear that
10 I would be on the team for my full 4 years at each university. I turned down offers at other
11 schools that were offering more money as I really wanted to row for Washington.

12 5. My coach Yaz made me aware of the roster limits and from what I understand, all
13 rowing teams in the NCAA are now required to have a roster cap of 68 athletes. We
14 currently have a team of over 100, so this would be a huge percentage of our team that will not
15 be able to return next year. Over 35 athletes would need to cut, and this would be based on their
16 rowing ability, and who would help contribute to making the team go as fast as possible. It was
17 not yet specified how these cuts/decisions would be made yet. I understood that once the roster
18 was named for that year, you would not be able to rename or change this roster meaning these
19 selections would be done very early in the year.

20 6. This is new roster cap is taking a huge mental toll on my teammates and I have
21 an incredible amount of empathy for them. Whilst this roster cap is not going to directly impact
22 me as I will have graduated, I can understand the relentless amount of effort, and dedication it
23 takes to get to this point in sport, and for some of my teammates it will be taken away from them.
24 Rowing alone is a sport that takes a huge mental toll, and this added pressure of a roster cap is
25 really effecting peoples stress levels and therefore athletic and academic performance. The
26 pressure of not knowing if you are going to be on this team next year is incredibly overwhelming
27 especially when you have put so much into making this team in the first place.

28 7. For someone on my team who could be cut, they would lose a team, a community,

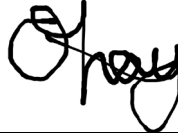
1 but most of all a family. Our team is a place where you can be a part of something bigger than
2 yourself, and work towards a common goal with others. It's incredibly special and hard to find
3 in other areas of life outside of sport. Along with this, if my teammates were cut from the team
4 they would also lose financial benefits, tutoring, meal plans, counseling, medical treatment, and
5 student athlete study facilities. For a lot of athletes on my team, this is a huge financial benefit,
6 and helps them to perform at their best in both sport and in their academics too.

7 8. With these new roster limits, for me as a co commodore on our team, I am
8 considering a lot about giving advice and helping my teammates to make the best decision for
9 their future development as a rower and a person. It is so challenging for my teammates when
10 you love this school and choose it because you were excited about your development you can
11 make in 4 years, but it now this might be taken away from you. A lot of my teammates are now
12 needing to consider life changing options like transferring schools, or giving up the sport to stay
13 at this school, which feels incredibly unfair. Spots at other schools might also be limited as they
14 will also need to be cutting their roster. Transferring schools can be an incredibly risky
15 experience, especially if you don't find the same community or friends like you had.
16 Academically this can also be challenging, from my experience I lost about 1 year worth of work
17 from transferring as my credits that I had earned were not accepted at my new institution. This
18 can be a waste of time, energy and money for a lot of students for something that was out of their
19 control. Along with this, I also had to switch my major when transferring schools, as the
20 requirements were different at my new school that what I had previously been studying. All up,
21 transferring had meant I needed to take an extra year of study, which was by choice, but I have
22 a lot of empathy for my teammates who would be forced to transfer school if they wanted to
23 keep rowing in college, and were cut from the rowing team due to the roster cap.

24 9. I am pleading to the court to please revoke the roster cap for NCAA division 1
25 schools. Thousands of athletes all over the country and the world have committed their lives to
26 play sport, and it is absolutely heart breaking that this could be taken away from them. Rowing
27 is a sport that takes time to develop, meaning potential talent could be cut before they get the
28 opportunity to shine. These roster caps would mean walk-ons would not be possible, and there

1 have been many Olympic champions that were once a walk on in college. Having no cap, allows
2 teams to have the room to develop and grow young talent, and take four years to develop them
3 properly.

4 I declare under penalty of perjury that the foregoing is true and correct.

5
6 

7 Dated: Seattle/King County, Washington

8 January 26, 2025

Olivia Hay
NCAA ECID No. 1907637117
9201 Interlake Ave, N,
Seattle, Washington 98103

Anna Heck
4485 Canadaville Loop
Eads, TN 38028

January 18, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Anna Heck. I am a current Division I athlete at the University of Notre Dame and my NCAA ECID number is 2106202181. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Anna Heck

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7 **DECLARATION OF ANNA HECK**

8 I, Anna Heck, hereby declare as follows pursuant to 28 U.S.C. §1746:

9 1. I am a sophomore on the women's golf team at the University of Notre Dame. I
10 am a member of the Injunctive Relief Class and object individually and on behalf of the class.

11 2. I've been playing golf for as long as I can remember. I played my first
12 competitive tournament at the age of five. In high school, I was the Individual State Champion
13 my senior year, a two-time Memphis-Area Girls Golfer of the Year, a three-time Individual
14 Regional Champion, and a three-time Team MVP.

15 3. I always knew I wanted to play golf at Notre Dame. My older sister played golf
16 there and had nothing but good things to say about it. Notre Dame was fortunately also
17 interested in me when I approached them during the recruiting season.

18 4. When they gave me an offer, I was so excited I could barely speak. I committed
19 during my junior year of high school, and formally signed the offer in my senior year. Notre
20 Dame promised me an athletic scholarship and a roster spot on the golf team for four years as
21 long as there was no misconduct on my end.

22 5. My freshman year on the team went very well. I was in the starting lineup for 3
23 tournaments and participated in all practices and workouts. I did everything that was asked of
24 me and more, both for the golf team, and for class.

1
DECLARATION OF ANNA HECK
CASE NO. 4:20-CV-03919-CW

1 6. We first heard about the possibility of roster limits at the start of the Fall
2 semester in my sophomore year, but no one thought they were a serious possibility at the time.
3 The coach first mentioned the settlement and the likelihood of roster caps being set somewhere
4 in the middle of the semester, but we didn't discuss them as a team until the end of the
5 semester. That was when it all became real to us.

6 7. We have nine girls on the team right now, and the roster limit for women's golf
7 is nine. Two seniors are graduating, but with three freshmen coming in, someone will need to
8 be cut. We're lucky to have coaches who care and don't want to cut anybody, but this process
9 will keep going and there will be no way to avoid it. I feel sick to my stomach knowing that
10 our team will be broken apart for no reason.

11 8. Our team is very close. We care about each other a lot, and don't want anyone to
12 be cut. We're upset to have to go into the Spring season essentially competing against each
13 other just to stay on the team, but we don't have any other choice. Either I get cut, or someone
14 I deeply care about gets cut.

15 9. It is hard to think about. Our team culture is strong. Regardless of who gets
16 cut, I know we will all remain very close. But with that one person not attending practice and
17 traveling with the team, it will be much harder.

18 10. While I've thought about the transfer portal, I don't think I will enter it if I'm
19 cut. Aside from the fact that I would have to give up my friends, my school, and my studies by
20 transferring to another team, I know how overwhelmed the portal will be with so many players
21 being cut.

22 11. This is why the roster limits are extremely unfair to high schoolers. I know
23 many girls in high school who are good golfers, but they have not been able to get recruited
24 because coaches are prioritizing the transfer portal or just don't have enough roster spots.

1 12. I am lucky that Notre Dame will honor my scholarship, but I know that not all
2 other athletes are as lucky. Some athletes are only able to attend college because of their
3 athletic scholarships, so if they're cut at a school that won't honor their scholarship, they'll
4 need to transfer or drop out of college.

5 13. That is heartbreaking. These roster limits go beyond sports – they affect
6 people's lives and educations. It isn't fair at all.

7 I declare under penalty of perjury that the foregoing is true and correct.

8
9 Dated: South Bend, Indiana
January 18, 2025



Anna Heck
NCAA ECID No. 2106202181
4485 Canadaville Loop
Eads, TN 38028

Sophia Heilen

4306 Mountain View Dr.
Haymarket VA, 20169

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken,

My name is Sophia Heilen. I am a current Division I athlete at William & Mary. My NCAA ECID number is 2001774650. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,

Sophia Heilen

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF SOPHIA HEILEN**

9 I, Sophia Heilen, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a junior at the College of William and Mary and a member of the NCAA
11 Division I women's swim team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 2. I chose William & Mary's swim team because it was an incredible group of
14 people who foster a culture of success and support. The team is like a family. We were all brought
15 here to be a part of that family and were promised a spot competing and training with that family
16 for 4 years.

17 3. I work hard on the team. I swim 20 hours a week and spend many additional hours
18 prepping for practice, stretching, dealing with injuries, and going to meets.

19 4. I heard of roster cuts on the news. Our coaches told us because of the cuts, we
20 will need to cut 4 women. The team is incredibly stressed about the potential cuts.

21 5. I fear being cut. If cut, I would lose the sport I love and a great group of people.
22 I will not continue my competitive swimming career if I lose my roster spot. Instead, I'll stay at
23 William & Mary and graduate. I don't want to give up swimming yet. I came here to swim for
24 four years—not three.

25 6. These roster cuts will affect every single college athlete either directly (if they are
26 cut) or by tearing apart their team. College sports is about unity and overcoming challenges
27 together. The cuts attempt to address the effects from the NIL lawsuit by doing the opposite of
28 what college sports are about. Athletes are what make the NCAA. Without them there is nothing.

If cuts are necessary, the court should have a grandfather period do them of a few years to allow teams to recruit smaller classes to make roster limits.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Haymarket, VA

January 28, 2025

DocuSigned by:

Sophia Heilen

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Sophia Heilen

NCAA ECID No. 2001774650

4306 Mountain View Dr.

Haymarket, VA 20169

Anya Helgerson
12303 98th Ave Ct NW
Gig Harbor, WA 98329

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Anya Helgerson. I am a high school student aspiring to be a future Division I athlete, and a member of the Injunctive Relief Class. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Anya Helgerson

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7 **DECLARATION OF ANYA HELGERSON**

8 I, Anya Helgersen, hereby declare as follows pursuant to 28 U.S.C. §1746:

9 1. I am 15 years old and am in 10th grade at Peninsula High School in Gig Harbor,
10 WA. I have been competing as a lacrosse player since I was 10 years old and hope to compete
11 on a Division I college team.

12 2. I understand that the settlement in this lawsuit will govern NCAA Division I
13 sports for the next decade, which is when I will be in college. I therefore am a class member
14 who could be affected by the terms of the settlement. I object to the settlement for the reasons
15 stated below, both for myself and for other class members like me.

16 3. As I pursue my dream to play collegiate athletics, I am driven to practice and
17 train long hours, and prioritize that goal over time with friends, part-time employment or other
18 endeavors. I have learned a lot about myself through this dedicated effort and know it will help
19 me become a stronger, more purposeful individual. I am in the middle of my recruiting season
20 and extremely concerned and anxious about how the proposed roster limits will affect not only
21 myself but the future of women's sports. I am already reading announcements from universities
22 who plan to cut programs, roster spots and athletics completely as a direct result of this
23 settlement.

24 4. Women's non-revenue sports, such as lacrosse, already operate under significant

1 financial constraints compared to their male counterparts in revenue-generating sports. Our
2 program relies on larger roster sizes to create competitive and diverse teams, as well as
3 accommodate the need for a robust athlete development pipeline. Reducing roster limits would
4 severely hinder the ability of these programs to maintain competitive standards, develop
5 athletes and foster team camaraderie. With women's lacrosse specifically, there will be a
6 gender disparity and inequality created with men's future roster cap at 48 while women's teams
7 will only be allowed 38 players. The NCAA's proposal unfairly undermines the core values of
8 inclusivity and equal opportunity.

9 5. For many female student-athletes in non-revenue sports, the opportunity to
10 participate in college athletics is also a critical part of their path toward future leadership roles,
11 including the military. I intend to pursue ROTC as a student-athlete. The proposed roster
12 limits put myself, and others on this path, at an even greater disadvantage. For example, an
13 athlete who is injured or has to take time off for ROTC training may find themselves at risk of
14 losing their roster spot, despite their commitment and sacrifice. The NCAA's roster limits
15 would mean coaches are less incentivized to hold spots for injured players or those pursuing
16 ROTC commitments, which is particularly harmful to women's non-revenue sports where the
17 margin for error is smaller and every athlete is critical to the team's success.


18 6. The potential loss of athletic scholarships disproportionately affects women as
19 most are non-revenue, and these sports are the most impacted by financial cuts in athletic
20 programs. This economic burden will exacerbate and widen the equality divide in college
21 athletics and potentially make a college education unattainable for many.

22 7. Instead of limiting opportunities, the NCAA should prioritize the sustainability
23 of athletic programs, ensuring resources and opportunities remain in place to develop both
24 successful student-athletes and future military and social leaders.

1 8. I respectfully request the court consider the human impact of these roster limits
2 and all the complexities this will entail. Revenue sports should not, and cannot, be the only
3 priority of the NCAA. I hope the court will recognize the deep, lasting negative impact these
4 cuts will have on me and my teammates, and all athletes affected. The parties can do better
5 and a fair solution can be found that allows us to continue pursuing our dreams as
6 student-athletes.

7 I declare under penalty of perjury that the foregoing is true and correct.

8
9 Dated: Gig Harbor, WA
January 26, 2025



Anya Helgersen

10
11 12303 98th Ave Ct NW
Gig Harbor, WA 98329
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Alayna Henage
339 Lauren Landing
Ballwin, MO 63021

January 9, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Alayna Henage. I am a current Division I athlete at the University of Kansas and my NCAA ECID number is 2204538652. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Alayna Henage

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF ALAYNA HENAGE**

9 I, Alayna Henage, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a 19-year-old college freshman at the University of Kansas (KU). I am
11 currently on the 2024-2025 roster of the KU Division I women's swim team. I am a member of
12 the Injunctive Relief Settlement Class and object individually and on behalf of the class.

13 2. I worked hard to swim to the best of my ability since I started swimming at 6
14 years old. I began swimming competitively at 9 years old. I have trained year-round, up to 6
15 days per week, for the past 10 years.

16 3. I also worked hard to balance my intense swimming practice schedule with my
17 academic work. I graduated from high school *summa cum laude* and was an Honor Roll
18 recipient. At the same time, I competed on the national level for the Parkway Swim Club and
19 Parkway South High School. I was on the team that won my school its first ever Missouri state
20 high school championship in back-to-back years (2022 and 2023). After getting second place in
21 the 100-meter breaststroke in my sophomore and junior years, I won the individual state
22 championship in the 100-meter breaststroke and 200-meter individual medley as a senior. Those
23 wins were my greatest accomplishments.

24 4. Just before I started my junior year in high school, the KU women's swim coach
25 invited me to visit and meet the team. I instantly fell in love with the team's positive chemistry.
26 Afterwards, the coach offered me a four-year athletic scholarship starting in 2024-2025. I had
27 been casually looking at about five other colleges, but since KU was my top choice, I didn't need
28 to apply to other schools. I was ecstatic and committed to KU in October 2022.

1 5. I also earned an academic scholarship that covered the other half of tuition that
2 was not covered by the athletic scholarship. I was promised that so long as I maintain a 3.25
3 GPA, I have a full ride to KU from 2024-2028 with both scholarships.

4 6. As soon as I started at KU in August 2024, I was determined to be the best student
5 and athlete I could be. I dove into the intense training schedule, which involves nine practices a
6 week, six days a week. There are multiple days where we practice in the early morning and in
7 the afternoon. I initially had a tough time balancing the demanding practice schedule with my
8 coursework, but I adjusted quickly. I ended up with a 4.0 GPA in the Fall 2024 semester.

9 7. At first, things were great. I was one of 34 swimmers at the beginning of the year.
10 The positive team environment was incredible, and everyone was so close and supportive. That
11 team spirit kept me going through the tough period of adjusting to the rigorous practice schedule
12 and new school environment.

13 8. I never thought that my dream could be ripped away so soon. In August, the
14 coach announced that after the mid-season meet in November, he would cut four players from
15 the team to meet a new roster limit of 30 players for the women's swim team, but that freshmen
16 would be safe for this round. After he cut two seniors, a junior, and a sophomore, he told the
17 team that he would have to cut even more of us, freshman included, to make space for nine new
18 freshmen who had already been recruited for next season. These cuts are all due to the anticipated
19 new roster limits that are a part of the proposed settlement.

20 9. Soon after, I had a personal meeting with our coach, who told me that I am likely
21 to get cut unless I pulled my race times up relative to my teammates. I was devastated. I asked
22 about that would happen to my athletic scholarship, and he said he didn't know. He only told
23 me that he would help me through the transfer portal.

24 10. I'm not ready to decide whether I should transfer to another school so I can still
25 compete. I am sick to my stomach. It is not fair that I am feeling pressure to leave KU after
26 only four months. I barely had a chance to adjust to the new team and coaching style, and now
27 I may be cut before the end of my freshman year.

28 11. The pressure to make the right decision is immense. It's a huge gamble to even

1 try the transfer portal. I'd only have a few weeks to decide to go to another school, and I don't
2 know if I jeopardize my scholarships just by applying. Even if I could transfer, I'd likely forfeit
3 my scholarships. I'm unlikely to get anything like the same offers at another school.

4 12. The financial burden of losing my scholarships is huge. On the one hand, I can't
5 let my parents down by going to a school without a scholarship just so I can swim on a college
6 team. On the other, there is nothing I have wanted to do more than swim in college. All I want
7 to do is stay on the team and finish out my four years at KU like I was promised.

8 13. The fear of getting cut from the team has infected the mood at KU, too. Our
9 healthy sense of competition has suddenly become cutthroat. I loved the KU women's swim
10 team because we were positive and collaborative, but the atmosphere is toxic now. Everyone is
11 on edge. We've become obsessed with our race times compared to everyone else on the team.
12 No one talks to each other about how they plan to navigate the new cuts, but the topic is the
13 elephant in the room at every practice and meeting. The team atmosphere went from supportive
14 to tense and suspicious.

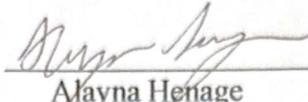
15 14. I am terribly stressed out. I feel like the weight of the world is on my shoulders,
16 and I fear the mental pressure will affect my athletic and academic performance in the new
17 semester.

18 15. When I was recruited in my junior year of high school, I didn't imagine that my
19 freshmen year would be a kill-or-be-killed competition. The worst part is that the roster limits
20 seem to be completely arbitrary. I don't understand why there are roster limits at all, or why
21 they must become effective so soon. Even our coach thought that the limits would be phased in
22 until the KU athletic department told him to make the cuts this year.

23 16. I worked incredibly hard for years to get here. I just want to keep what I was
24 promised two years ago. It isn't fair to rip that away now.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Dated: Ballwin, Missouri
3 January 9, 2025



4 Alayna Henage
5 NCAA ECID No. 2204538652
6 339 Lauren Landing
7 Ballwin, MO 63021

Avery Henage
339 Lauren Landing St.
Ballwin, MO 63021

January 21, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Avery Henage. I am a high school sophomore and soccer player. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Avery Henage

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF AVERY HENAGE**

9 I, Avery Henage, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a high school sophomore and soccer player. I hope to be recruited to
11 compete on a Division I college team. I am a member of the Injunctive Relief Settlement Class
12 and object both individually and on behalf of the class.

13 2. I began playing soccer when I was four years old and started playing at the club
14 soccer level when I was eight. I currently play for St. Louis Development Academy in the Girls
15 Academy League, which is a national level girls league. This level of play requires three
16 practices per week, and we travel throughout the country to compete against other high-level
17 club teams. I compete at this level because it is my dream to play college soccer at the Division
18 I level. Because I travel throughout the country, I sometimes have to miss social activities such
19 as school dances and multiple sporting events. But the game of soccer is my passion and I love
20 competing, so it is worth the sacrifice.

21 3. This winter, my team and I competed in the Girls Academy College Showcase
22 where hundreds of college scouts were in attendance. We ended up winning our age group
23 bracket, which garnered the attention of many Division I coaches. Due to NCAA recruiting
24 rules, I cannot speak to coaches until June 15th, 2025; but I am very excited for the opportunity
25 to go through the college recruiting experience soon.

26 4. However, I am hearing a lot of information on the effects the proposed NCAA
27 roster limits will have on the college recruiting process; and I am very worried these limits will
28 affect my chances to play Division I soccer. If college coaches are forced to limit their roster

1 sizes, there will be a trickledown effect to recruiting. Coaches will be forced to live within
2 arbitrary limits and if their rosters are full, they will be recruiting less high school students and
3 recruiting more college aged students who are transferring through the portal. Or, they will be
4 looking for older athletes from other countries.

5 5. I have already heard of several current high school seniors and juniors getting the
6 offers to play in college pulled due to these limits. It's heartbreaking to see players' dreams
7 ripped from underneath them. I'm very concerned this could happen to me and my teammates.

8 6. All this uncertainty is causing stress. I feel very on-edge when I know college
9 scouts are watching me play because the entire recruiting process has become more cutthroat.

10 7. I don't understand the reason for these limits being a part of the NCAA NIL
11 lawsuit. Most soccer players just want to play soccer in college and receive an education. We
12 will not be in it to earn money, we just want to continue playing the sport we love at the college
13 level. The only sports that generate huge amounts of money for NIL are football and men's
14 basketball. The non-revenue generating sports at colleges will be severely impacted with roster
15 and budget cuts which will impact those sports or eliminate them at certain colleges.

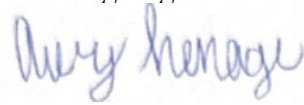
16 8. If I am not able to play soccer in college, I will be crushed. I've worked very
17 hard for many years to make this dream come true. My parents spend a lot of money for me to
18 travel and play club soccer, with the understanding that I could receive an athletic scholarship to
19 play in college. If I am not able to play in college, I will feel bad that my parents spent so much
20 money helping me chase my dreams.

21 9. I hope something will change with these roster limits so that many of the current
22 and future athletes that have been working so hard can live out their dream to continue their sport
23 in college.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Dated: St. Louis County, MO

3 January 21, 2025



4 Avery Henage
339 Lauren Landing St.
Ballwin, MO 63021

Avery Henke
934 McKinley Ave.
Auburn, AL 36830

January 20, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Avery Henke. I am a current Division I athlete at Auburn University and my NCAA ECID number is 2106194071. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Avery Henke

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF AVERY HENKE**

9 I, Avery Henke, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a swimmer and sophomore at Auburn University. I am a member of the
11 Injunctive Relief Settlement Class and object on behalf of the class.

12 2. I began swimming at a very young age, but the sport became my life once I got
13 to high school and realized I wanted to swim in college. Teurlings Catholic High School had a
14 very small swim program. Yet even though I was very good at other sports, I sacrificed joining
15 my friends at packed football stands and baseball fields to devote my life to swimming. I
16 practiced every day, including twice a day, three times a week. Although my rigorous practice
17 schedule prevented me from having a “normal” high school experience at times, it was worth it
18 because of how much I love my sport.

19 3. In high school, I won numerous state championships and to this day hold
20 numerous team and state records, in addition to being the fastest swimmer in Teurlings Catholic
21 High School’s history. I was also the No. 1 recruit in the state of Louisiana at the time I was
22 recruited.

23 4. This greatly benefited me in the recruiting process, and I was very fortunate to
24 have a lot of schools reach out to me. I spoke with many coaches and received offers from many
25 schools. When I spoke to coaches, the conversations focused not only on swimming, but also
26 logistics and personalities. I grew up a lot during the recruitment process. Deciding where I
27 would be for the next 4-5 years of my life at the age of 16 was a tough decision.

28 5. I ultimately went on three visits, but as soon as I visited Auburn, I knew I couldn’t

1 live without it. It had the best culture, people, and school spirit, and I knew I'd fit in very well.

2 6. Since I arrived on campus, I've made many friendships and have learned a lot
3 about myself. My first year was a blast. The team and I got along so well, and I loved every
4 minute of practice and competition. I didn't think anything could derail my dream.

5 7. When I first heard about the roster limits in late summer 2024, and I didn't know
6 much other than the fact that Grant House, who is also a swimmer, was filing a lawsuit against
7 the NCAA. I only realized the roster limits would seriously impact me when the SEC announced
8 a further cut to the NCAA roster limits with a 22-man roster.

9 8. Since then, my coaches haven't told us any specifics about who is getting cut and
10 when, but they have been encouraged not to let the possibility of the cuts affect our training or
11 meet performance. I don't know how that's possible. We are all impacted with fear and
12 uncertainty. It seems like our coaches are planning for the worst while hoping for the best when
13 it comes to the cuts, because there is still a lot of ambiguity. No one knows anything, which
14 means no one can plan for anything.

15 9. As far as team culture goes, we have been supportive of one another, but all of us
16 are distressed about the possibility of losing some of our teammates next year. We know some
17 people are 100% safe, but are equally aware that there are people who will get cut if these roster
18 limits go through.

19 10. I am afraid to get cut from the team, not just because I love it, but also because it
20 will put me and my family in a tough position financially. I am fortunate to have a partial
21 academic scholarship, and I currently receive numerous athletic benefits that I would lose if I
22 were cut. Right now, I can eat in the athletic cafeteria, which saves me a tremendous amount of
23 money because it provides free meals Monday-Friday. I also get free healthcare from the athletic
24 clinic, where we can go for urgent care needs like X-rays. Additionally, athletes get access to
25 free tutoring, world-class athletic facilities, and various school sporting events. Having access
26 to this was what I was promised when I committed to Auburn, and part of the reason I came.

27 11. I am also sad about the possibility of being cut because I feel like I haven't had
28 the chance to reach my full potential on the team. I know I bring a lot of value to the team and

1 I'm a great teammate, but I still have room to grow in the pool. In swimming, athletes tend to
2 reach their peaks in their junior and senior years, because as underclassmen, they're still
3 adjusting to life as a college student and athlete.

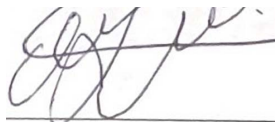
4 12. No one from my team has transferred yet, but I know the portal is getting
5 oversaturated with swimmers trying to find another team because of the roster limits. As much
6 as I don't want to be anywhere but Auburn, if I am cut, I may have no choice but to try my
7 chances in the transfer portal because no matter what, I do not want to retire from swimming.

8 13. My main concern about the roster limits in this settlement is how it will affect the
9 whole sport of swimming, especially in the United States. Our universities provide amazing
10 opportunities that aren't available in a lot of other countries, which is why we have so many
11 international students here in the United States. In the swimming world, developing swimmers
12 will lose the ability to grow into top athletes, which will hurt the entire sport.

13 14. Some of the fastest swimmers at Auburn were not as strong in high school, but
14 they were able to exceed everyone's expectations once they got to college. If roster limits are
15 approved, many swimmers will be discouraged from even trying at younger and younger ages.
16 I'm afraid many young people will just quit the sport altogether instead of competing in an even
17 more vicious environment, where you have to swim for your life to survive. That's not what
18 college sports should be about.

19 I declare under penalty of perjury that the foregoing is true and correct.

20
21 Dated: Auburn, Alabama
January 20, 2025



22 Avery Henke
23 NCAA ECID No. 2106194071
24 934 McKinley Ave.
25 Auburn, AL 36830
26
27
28

Victoria Henkel
509 N. Gertruda Ave. #1
Redondo Beach, CA 90277

January 29, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Victoria Henkel. I am a current Division I athlete at Long Beach State University and my NCAA ECID number is 2208643161. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Victoria Henkel

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF VICTORIA HENKEL**

9 I, Victoria Henkel, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I grew up in Redondo Beach, California, and just finished the first semester of
11 my freshman year at Louisiana State University in Baton Rouge, Louisiana. I have been a
12 member of LSU's Division I beach volleyball team and thus am a member of the class of student
13 athletes in this lawsuit. I am submitting this declaration to object to the roster limits that are
14 included in the proposed class settlement.

15 2. I started playing indoor volleyball when I was 9 years old and started competitive
16 beach volleyball when I was 11 years old.

17 3. I soon focused on beach volleyball and quickly improved. In tenth grade, I joined
18 a nationally ranked beach volleyball club team and was selected as a member of the U.S. National
19 Team Development Program.

20 4. The Junior Volleyball Association named me "Best of the Beach" during my
21 junior and senior years and my club team won the national championship in both of those years.
22 My senior year, I played on the top court for my club team and was recognized as a First Team
23 All American.

24 5. I started to be recruited by LSU and several other college teams in the summer
25 following my sophomore year of high school. I visited the LSU campus during my junior year
26 and verbally committed to play on their Division I Beach Volleyball team shortly thereafter. I
27 signed my formal letter of intent to play at LSU on signing day during my senior year in
28 November 2023.

1 6. I turned down offers from other programs to play at LSU. I wanted to challenge
2 myself and play on the best team I could. LSU is consistently one of the top-ranked beach
3 volleyball teams in the country, and I knew the coach from the National Team Development
4 Program. It seemed like the perfect place to take my game to the next level.

5 7. I first heard about the proposed roster limits soon after starting at LSU. In
6 September 2024, about a month after starting at LSU, during a team meeting our coaches told us
7 about the roster limits being proposed. They said our team was over the limit and that they would
8 need to cut existing players.

9 8. This truly changed everything for me at LSU. I no longer could concentrate on
10 enjoying my college experience nor being a great student. Instead, it seemed like every moment
11 I was being judged. This changed my experience at LSU to the negative. I became unhappy
12 and disillusioned with the whole experience and became depressed.

13 9. I worked extremely hard through high school to get to Division I. Roster sizes
14 had never been limited before. When I was being recruited, I was offered and accepted a roster
15 spot, but now a spot for me or my teammates was being taken away because of some lawsuit
16 settlement that had nothing to do with us. This doesn't seem fair, and it seems wildly arbitrary.

17 10. My unhappiness led me to the transfer portal. I am fortunate that I was able to
18 transfer to Long Beach State, where I will play on their beach volleyball squad this spring. Long
19 Beach's team, however, currently has more athletes that are allowed under the roster limit. The
20 coach will have to make cuts after the spring season to ensure compliance with the roster limits
21 next year if this settlement is approved.

22 11. These roster limits are harmful and nonsensical. We should be supporting more
23 student-athletes in Olympic sports, not fewer. Further, it seems like the settlement does not
24 understand the format of certain sports. For example, beach volleyball is played in pairs. An
25 even-numbered team allows every player to participate in a full-team scrimmage because every
26 player has a partner. Yet the settlement sets the roster limit for beach volleyball at 19 student-
27 athletes—leaving one player as the odd person out. This is just another way that this makes no
28 sense.

12. I feel lucky that I was able to transfer to a new team and be close to home and happy again. Many of my friends and teammates will be limited from teams in the future. I heard the number of girls who will lose a place to play next year to be at 75! 75 girls will no longer be able to chase their dreams! And for what? Because we were swept up in some larger lawsuit settlement which has nothing to do with us. A larger lawsuit settlement that has to do primarily with Football and Basketball and nothing to do with us! So why are we being harmed by it?

13. These roster limits only serve to hurt student-athletes, and I object to them being adopted.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Redondo Beach, California

January 29, 2025

Signed by:

Victoria Henkel

041754A48E244C8...

Victoria Henkel

NCAA ECID No. 2208643161

509 N. Gertruda Ave. #1,
Redondo Beach, CA 90277

Abigail Hood
287 Pheasant Hill Drive
Rockwall, TX 75032

January 30, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Abigail Hood. I am a current Division I athlete at Texas A&M University and my NCAA ECID number is 2202434924. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Abigail Hood

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF ABIGAIL HOOD**

9 I, Abigail Hood, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a Freshman at the Texas A&M University and a member of the NCAA
11 Division I Women's Swimming and Dive team. I am a member of the Injunctive Relief
12 Settlement Class and object both individually and on behalf of the class.

13 2. I practiced multiple times a day, 6 days a week, in high school to have the chance
14 of being a Division I college athlete. I had to miss other activities and social events because of
15 my dedication to swimming.

16 3. I placed 3rd in the Texas UIL 6A 100 Butterfly at the state meet, setting a school
17 record in the process. With my club team I achieved a U.S. Open cut, multiple Junior National
18 cuts, and many Futures cuts. I am a 4-time NISCA All American.

19 4. During recruiting, I chose Texas A&M over other schools for its high level of
20 competition in the Southeastern Conference (SEC), the fact that the coach had a history of
21 developing swimmers to reach their full potential, the quality of Texas A&M University, and the
22 proximity to home. The coach promised that if I hit certain times in the pool, I would receive
23 more scholarship money. He emphasized that my initial offer could increase as I progressed.

24 5. Ultimately, I turned down an offer of a 90% scholarship to compete for a different
25 D1 school to accept the opportunity to swim at Texas A&M. I was attracted to the higher level
26 of competition and room for development, even though my initial offer was considerably less. I
27 knew I could work hard to earn more scholarship money.

28 6. I learned about the roster limits in the *House v. NCAA* settlement from news

1 articles. Ten girls were cut last summer when a new coach arrived. Currently, we will have 35
2 women on the roster in the fall, which means 5 people will need to be cut under the proposed
3 limits.

4 7. This is taking a toll on the team. Because of the cuts last summer, we all feel the
5 uncertainty of what is coming with new freshman coming in the fall.

6 8. If cut, I will lose my current scholarship, the food provided in the athlete dining
7 hall and team room, medical care I am currently receiving, tutoring, access to athlete-only
8 facilities, and counseling.

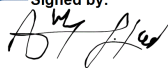
9 9. Because of the pending limits, I am considering what it may look like to either
10 stay at my school and finish my degree or transfer to another school to compete. Unfortunately,
11 I had to redshirt due to an injury, so the chance of transferring is low. If I am cut from the team,
12 I will likely be forced to retire from swimming long before I was led to believe when I committed
13 to swim at Texas A&M.

14 10. I do not agree with imposing roster limits without consideration of the existing
15 student athletes who will be negatively impacted. The roster limits will cause tremendous harm
16 on thousands of athletes. I ask that you do not approve the settlement as it is written.

17 I declare under penalty of perjury that the foregoing is true and correct.

18 Dated: Rockwall, Texas

19 January 30, 2025

Signed by:

6648701FAF0548A...

Abigail Hood
NCAA ECID No. 2202434924
287 Pheasant Hill Drive
Rockwall, TX 75032

Avery Hudzik
2631 Normandy Rd,
Charlotte NC 28209

January 21, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Avery Hudzik. I am a current high school student at Charlotte Country Day School and a swimmer. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Avery Hudzik

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4
5 IN RE COLLEGIATE ATHLETE NIL
6 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

7
8 **DECLARATION OF AVERY HUDZIK**

9 I, Avery Hudzik, hereby declare as follows pursuant to 28 U.S.C. §1746:

10 1. I am 14 years old and am in 8th grade at Charlotte Country Day School. I have
11 been a competitive swimmer since I was 5 years old and hope to swim on a college swim team.
12 I understand that the settlement in this lawsuit will govern NCAA Division I sports for the next
13 decade, which is when I will be in college. I therefore am one of the class members who could
14 be affected by the terms of the settlement, and I object to the settlement for the reasons stated
15 below, both for myself and for other class members like me.

16 2. I am a member of the Mecklenburg Aquatic Club Swim Club, the top age group
17 club in the country made up of swimmers from North and South Carolina. We swim 52 weeks
18 per year, 7 days per week, sometimes twice per day. I spend more time on my sport than almost
19 anyone I know, except for my friends on the swim team. It's a lot, but I do it because I love it
20 and for what it teaches me about how to be a better teammate and overall person. I also know
21 that this is the work that's needed if I want to swim in college.

22 3. My favorite events are the 100 free and 200 free. Just this year I achieved the
23 milestones of swimming under 55 seconds and 2:00 minutes respectively in these events and
24 qualified for 10 events at the State Championships and 8 for southern sectionals.

25 4. My mother was a competitive runner in college. She often talks about how
26
27
28

1 important her college athletic experience was to her; specifically how much the discipline and
2 structure helped her excel in her studies, the lifelong friends she made, and she insists that her
3 achievements in college athletics was critical in helping her secure her first job at a top consulting
4 firm.

5
6 5. Sure, it would be great if I were to secure a scholarship, but that's not my ultimate
7 goal, I simply want to be able to continue my swimming career into college, so that I can continue
8 to achieve both athletic and academic success, make great lifelong friends like my mom did, and
9 best prepare myself to excel post college. I am worried that if colleges have a limited number of
10 spots on the team that I either won't have the opportunity to swim at all, or that I may find
11 myself without a spot if I get injured or sick, or that my friends and teammates might
12 have that experience. It would honestly be devastating.

13
14 6. I don't know if a judge will listen to an 8th grader, but I am submitting this because
15 I hope so. Roster limits could have a big effect on the future for my teammates and me, and it's
16 a bad idea.

17 I declare under penalty of perjury that the foregoing is true and correct.

18
19 Charlotte, North Carolina
20 January 21st, 2025

Avery Hudzik

Avery Hudzik
2631 Normandy Rd.,
Charlotte NC 28209

Eleanor Hughes
Defoe-Graham Hall
901 Hitt St
Columbia, MO 65201-52088

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Eleanor Hughes. I am a current Division I athlete at the University of Missouri and my NCAA ECID number is 2303813992. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Eleanor Hughes

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF ELEANOR HUGHES**

9 I, Eleanor Hughes, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a Freshman at the University of Missouri (Mizzou) and am a member of the
11 NCAA Division I women's swimming and diving team. I am a member of the Injunctive Relief
12 Settlement Class and object both individually and on behalf of the class.

13 2. Throughout high school, my aspiration for college was to secure an opportunity
14 to participate in a high-level Division I swim program. Recognizing the arduous path to
15 achieving this goal, I realized the need for increased dedication and a commitment to consistent
16 practice. My club team's rigorous schedule entailed practicing both before and after school,
17 resulting in continuous 12-hour days spent at the pool and in class.

18 3. Each week, I dedicated over 20 hours to practice, while keeping up with my
19 academic responsibilities, including college-level courses, and attempting to maintain a social
20 life. Sacrifices to pursue my dream included missing crucial academic tests in order to
21 participate in swim meets, forgoing summer camp with friends to continue improving my
22 capability to compete throughout the year, and deviating from the typical high school experience
23 to prioritize my training. My peers often struggled to comprehend my absences from various
24 activities and the significant time I spent at the pool, all driven by my singular objective of
25 competing for a Division I team.

26 4. My high school and club swimming teams were both highly competitive. During
27 my high school swimming career my team won two out of three state championships.
28 Personally, I was a key contributor in a state championship relay while establishing a new state

1 record. I placed second and sixth in the MN high school State Championship meet and was an
2 All-American.

3 5. On the club team, I was an individual state champion three times while achieving
4 three state championships within relays. I placed sixth in the nation on a relay and eighth in the
5 nation individually. These achievements throughout high school helped me get recruited by
6 teams I had worked so hard to be a part of, and ultimately led me to The University of Missouri.

7 6. In my recruiting experience, I sought a competitively high-level swim and dive
8 team while also considering a school that aligned with my long-term personal interests. During
9 conversations with coaches, I prioritized the team's culture and its emphasis on valuing each
10 swimmer as an individual beyond their athletic abilities. Having come from two teams that
11 prioritized these qualities, I recognized the significance of these attributes in a team environment
12 and sought to find such a program in a competitive college environment.

13 7. In my Junior year, I verbally committed to a school and swimming program that
14 was well known and would have allowed me to serve my personal interests as well as my
15 country. However, upon deep reflection and continued success in my swimming and academic
16 pursuits, I decided to shift my plan in March of my senior year, essentially restarting the
17 recruiting process. At this stage, most coaches had finalized their recruiting classes and were
18 unlikely to add new recruits. However, I remained steadfast in my pursuit of a competitive
19 program that would complement my personal interests while providing a required amount of
20 financial support.

21 8. While I initially thought The University of Missouri would be an ambitious step,
22 the coaching staff extended an invitation to be a part of their swim and dive program and
23 provided the financial support that my family and I required at that time. When I made the
24 decision to swim at Mizzou, roster reductions were not a concern, and I was very excited to see
25 how much I could grow and contribute to the team for the next four years. The coaching staff
26 recognized my potential and anticipated that their program would enhance my performance, and
27 I proceeded with an expectation that I would have the opportunity to compete with the team
28 throughout my collegiate career. I was particularly drawn to the team culture that the coaches

1 at Mizzou had established, particularly emphasizing a focus on each individual as a person,
2 rather than solely as their capability as a swimmer. Despite a short time of recruitment, the
3 coaches were very welcoming, very hopeful and they provided me with a financial scholarship
4 I needed to attend college.

5 9. Within a few weeks of my time swimming at Mizzou, I gained an initial
6 knowledge of potential roster limits due to Southeastern Conference-imposed (SEC) restrictions
7 stemming from the *House vs. NCAA* settlement. While I had a basic understanding of some of
8 the dynamic environment within the NCAA, I learned more as I engaged in discussions about it
9 with my teammates, which prompted me to conduct further research as I began to become
10 concerned about my ability to continue increasing my swimming capabilities and contributions
11 at Mizzou.

12 10. In late November 2024, our coaching staff held separate meetings with the
13 women's and men's teams to discuss roster limits. This was the first time the team received in-
14 depth information from the coaching staff regarding the potential impact on the 2025 spring and
15 fall seasons.

16 11. For the majority of the year, we were aware that these roster limits would
17 significantly affect the men's program. However, it was during this meeting that we learned that
18 the limits would also extend to the women's program. Currently, I understand the women's cap
19 will be 30 team members under the *House* Settlement, while the men's team will be 22 under
20 the SEC's proposed additional limits. If this is indeed the final decision for SEC swim and dive
21 teams, this will require critical cuts for both the women's and men's programs. Furthermore, we
22 were informed that additional cuts may be required beyond those necessary to reduce the number
23 of athletes on the team in order to facilitate the recruitment of transfers from other programs.

24 12. Presently, I find myself in a challenging position on the team, with significant
25 uncertainty about my future. I was involved in a severe accident early in November of my first
26 season (this year), which has impacted my improvement and performance as I was prevented
27 from training for approximately 6 weeks. Prior to the accident, with the help of the high-level
28 training from Mizzou, I was on track to achieve one of my best seasons and contribute

1 substantially to the team's success. However, the accident hindered my progress. I am training
2 and competing again, and I continue to make improvements just as I had been making prior to
3 my accident. However, with coaches needing to make roster decisions based on NCAA and
4 SEC limits, I now believe my position on the team – and potential to continue to improve and be
5 both a significant contributor at Mizzou and within the SEC – is in jeopardy.

6 13. Given the implementation of roster limits, I am concerned about the possibility
7 of being cut due to these restrictions. If the limits were not in place, with the help of the Mizzou
8 coaching staff and program, I could focus on continuing to regain my competitive fitness level
9 and improving my performance both in and out of the water. However, with roster limitations,
10 I now feel a pressure to perform at an upperclassmen level in order to secure a position on the
11 team. *As the NCAA prioritizes three important principles – academic success, student-athlete*
12 *well-being, and fairness – I feel compelled to share that the House vs. NCAA settlement (and*
13 *subsequent SEC) roster limitations are not reinforcing those priorities for me.*

14 14. As for my teammates, my closest friends are also at risk of being eliminated from
15 the roster. In a relatively short period, I have forged some of my closest friendships with
16 teammates on this team. As a class, we have developed a unique and exceptionally close bond.
17 The roster limitations not only have a profound impact on the individuals who are eliminated but
18 also affect those who remain. The newly formed team will be required to construct a new team
19 culture and values, in the midst of potentially lost and cherished friendships, each of which are
20 essential for our team to achieve success. Together, we have established one of the most robust
21 team cultures this program has witnessed in recent years. Each member recognizes the
22 significance of our team culture in our performance, and we firmly believe that the absence of
23 this rich culture would have a substantially detrimental effect on the team's performance.

24 15. The topic of roster limitations has had a significant psychological impact on me
25 and my teammates over the past few months. We have not only had to balance the mental
26 demands of our sport, academics, and adjustment to college life, but we have also grappled with
27 substantial stress, sadness, and mental challenges stemming from roster limits. As a freshman
28 class, we have forged a strong bond and engaged in numerous conversations and shed tears

1 contemplating the possibility of being cut or the potential trajectory of our class next year. We
2 have approached every dual meet and midseason competition with the apprehension that
3 underperformance may result in our removal from the team.

4 16. Even during practices, I have harbored the fear that subpar performance could
5 jeopardize my position. These concerns have engendered a substantial mental strain and burden
6 that would not have arisen during our freshman year had this topic not been persistently
7 discussed within the team. Furthermore, this situation has adversely affected the team dynamic,
8 fostering a competitive environment where individuals prioritize securing a spot on the team
9 rather than fostering camaraderie and encouraging teammates to enhance their performance so
10 that the team can improve.

11 17. If I were to be cut from the swim team next year, I would suffer significant
12 consequences. The most detrimental impact would be the loss of my passion for the sport. Being
13 removed from this program that has been my dream throughout my high school career would be
14 devastating. I feel I would lose my excitement for the sport because I would no longer have the
15 team I come to know and cherish by my side every day. I would also miss the coaches who have
16 become close friends and mentors, and the determination that has driven me to compete in
17 swimming since I was seven years old.

18 18. Furthermore, I would unexpectedly lose financial aid that the team provides me
19 with. This aid covers essential expenses such as tuition, housing, and other living costs.
20 Additionally, I would lose the SEC academic incentive of \$3,000 for a 3.5 GPA or higher, which
21 helps me cover my tuition, housing, and other important aspects of college life.

22 19. The athlete dining hall, which provides us with affordable meals, would also be
23 a loss. I am currently in the process of signing a three-year housing lease, but my roommates
24 and I are uncertain about our future at the school. Therefore, we are in a state of uncertainty due
25 to the need to secure housing while not knowing the financial impact we may incur if we are no
26 longer swimming with the program or attending Mizzou due to financial hardships encountered
27 as a result of no longer swimming.

28 20. My father has been unemployed for over a year, and the financial aid provided

1 by the swim team has significantly helped my family afford the cost of attending college.
2 Without this aid, I would not be able to be a student athlete at Mizzou. Consequently, if I were
3 no longer a part of the swim team, my family would not be able to afford attending the university,
4 and I would likely have to relocate to a different school to pursue my college education.

5 21. In essence, the consequences of being cut from the team would be far-reaching
6 and detrimental. I would lose my identity in the sport, as a significant portion of my success has
7 come from swimming. If my four years of swimming at Mizzou were to be shortened due to an
8 unforeseen roster reduction that I didn't know about prior to committing to the program, I would
9 be disheartened and lose the love and purpose that drive me as an athlete.

10 22. The list of potential losses is extensive, encompassing aspects such as my
11 purpose, identity, financial stability, college education, friendships, coaches, academic
12 incentives, and many more facets of this sport.

13 23. Over the past two months, I have been contemplating the potential consequences
14 of being removed from this program because of roster cuts. Each day, I find myself considering
15 various scenarios. While I have contemplated the possibility of entering the transfer portal, I
16 had not anticipated the need to transfer schools during the recruitment and consideration process.
17 This school and team hold a special place in my heart, and I cannot envision transitioning to a
18 completely different team culture and school environment.

19 24. Our coaches have indicated that they will inform us of any potential risks of being
20 cut by the end of the season. In such a scenario, they recommend that we enter the transfer portal
21 as a precautionary measure. However, if we believe we're at risk and wish to maximize our
22 ability to speak with other coaches and immediately choose to consider other programs via the
23 transfer portal, our scholarship at Mizzou will be terminated, regardless of whether we remain
24 with the team in subsequent years or not.

25 25. If I were to be cut this upcoming season, I am uncertain whether I would continue
26 swimming in college due to the loss of the determination and passion I have for this sport.

27 26. If I were to enter the transfer portal, I would encounter a competitive pool of fast
28 swimmers, and I believe it would be challenging to find a similarly high-level Division I program

1 that would provide a similarly rich experience that I anticipated and committed to at Mizzou. I
 2 also believe the roster limitations at each school going forward would have a significant impact
 3 on the availability of spots for transfer students, thus limiting my ability to join another team.

4 27. I firmly believe that implementing these roster limits would have not only a
 5 negative effect on me personally, but they would have a profoundly detrimental impact on the
 6 sport of swimming as a whole. Such restrictions would fundamentally alter the image of
 7 collegiate swimming, thereby diminishing the opportunities available to swimmers of all levels.
 8 From the viewpoint of a high school swimmer, these limits would significantly curtail their
 9 chances of pursuing swimming in college due to the cascading effect they would have on every
 10 NCAA Division and every institution involved.

11 28. The unintended consequences of roster limits are far reaching. Therefore, I ask
 12 that the Court reconsider and remove mandated roster limits entirely. At minimum, I ask for
 13 roster limits to be phased in over time. This will allow athletes – like me – who have already
 14 entered collegiate programs to continue our participation in those programs. We committed to
 15 programs and a path for our future under very different circumstances without the knowledge
 16 that such drastic roster decisions would impact our experience.

17 29. Eliminating or phasing in roster limits over time would allow me, and thousands
 18 of others like me, to proceed with a collegiate athletic experience that fulfills the NCAA's
 19 principles that prioritize not only academic success, but student-athlete well-being and fairness.

20 30. Thank you for your consideration.

21 I declare under penalty of perjury that the foregoing is true and correct.

22 Dated: Columbia, Missouri

23 January 26, 2025



24 Eleanor Hughes
 25 NCAA ECID No. 2303813992
 26 Defoe-Graham Hall
 27 901 Hitt St
 28 Columbia, MO 65201-5208

John Ingram
2103 Cypress Point West
Austin, Texas 78746

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is John Ingram. I am a current Division I athlete at Vanderbilt University and my NCAA ECID number is 2303800157. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
John Ingram

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF JOHN INGRAM

I, John Ingram, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a tennis player at Vanderbilt University. I am a member of the Injunctive Relief Settlement Class, and I object individually and on behalf of the class.

2. I began playing tennis when I was seven years old. It has always been a huge part of my life. I played for my middle and high school teams, and I also trained at the Austin Tennis Academy.

3. My hard work has resulted in significant accomplishments. In high school, I was ranked first in the nation in 18&U doubles. I finished second at a Level 1—the highest level—junior tennis tournament. I made it to the quarterfinals of the Boys 18&U National Hard Court Championship tournament in doubles. I was consistently ranked as a top five tennis player in Texas. My high school team that I captained won the state championship. And I went undefeated in matches my senior year of high school.

4. Playing college tennis has been my goal for a long time. I started talking to Division I coaches during my junior year of high school, after I had achieved a string of great results. Coaches suggested that they would have better opportunities for me if I joined as a class of 2024 recruit, rather than a class of 2023 recruit. They explained that this was because Covid had given many college players a fifth year of eligibility, so they were staying on teams for one more year and there would be more openings in 2024. So, I took a gap year after I graduated from high school in 2023 to work on my game and to improve my recruitment options. I was rated a five-star recruit and had multiple offers, including some with substantial scholarships.

1 5. During my gap year, I began speaking with the coach at Vanderbilt. I liked the
2 Vanderbilt coach immensely, and my Austin Tennis Academy coaches highly recommended
3 him. The coaching staff at Vanderbilt watched me play at a few tournaments during my gap
4 year and offered me a spot on their team and a partial academic scholarship. My scholarship
5 was guaranteed for my four years of college.

6 6. The coaching staff really believed in me. While they told me I might not see
7 match play right off the bat, they believed that I could develop into a top player. They even told
8 me that they could increase my scholarship amount if I developed the way they anticipated. So,
9 even though Vanderbilt did not offer me the most scholarship money out of the schools who
10 recruited me, I decided to accept the offer.

11 7. It didn't hurt that Vanderbilt is a top-notch school. Academics are important to
12 me. I want to make sure that I am getting a high-quality education while I work at tennis.
13 Vanderbilt made it so that I didn't have to choose between a fantastic education and a wonderful
14 tennis program. The SEC is the most competitive tennis conference, so I knew I would grow on
15 the court over 4 years. But I also knew that Vanderbilt would push me in the classroom.

16 8. So far, my experience at Vanderbilt has not disappointed—except for the
17 potential roster limits. I have become close friends with all my teammates. The team has a great
18 culture where we all support one another, on and off the court. My roommate is also on the
19 tennis team, and we have become fast friends. Off the court, I am really enjoying my coursework
20 and I am succeeding academically with a 3.8 GPA.

21 9. I decided to attend summer school at Vanderbilt before starting my freshman fall.
22 One morning, I was eating breakfast and looking at Instagram as usual. A post came up on my
23 Instagram that talked about the House settlement and the potential imposition of roster limits. I
24 did not think too much of it at the time.

25 10. But roster limits did not go away. In October 2024, the coaches told the team that
26 the House settlement had been preliminary approved and that the roster limits could go into
27 effect next year. The head coach told us that he did not plan to make decisions about cuts until
28 he had to, but that, if the limits went into effect, he would be cutting members of the team.

1 Vanderbilt currently has 15 players on its roster.

2 11. Things changed in December 2024. My coach attended the all-coach SEC
3 meeting, and the SEC told him that the roster limit for men's tennis would be nine players.

4 12. After my coach returned, he called me for a meeting. He told me about the new
5 potential limit of nine players. And he told me that he did not envision keeping me on the team
6 if the roster limits went into effect. He encouraged me to enter the transfer portal as soon as
7 possible and told me he would lend me his full support in trying to find another roster spot. I
8 entered the transfer portal shortly thereafter.

9 13. These roster limits are not fair. I feel that I fell behind my peers because of the
10 NCAA rules governing gap years and so am now more likely to be cut. The NCAA does not
11 allow players on a gap year to play in a tournament from March of their gap year until they are
12 fully enrolled at a university. So, from March 2024 until August 2024, I was prohibited from
13 playing in matches. That was fine because I was already recruited to Vanderbilt and did not
14 think I would have to get recruited again next year. As a result of the gap year, the coaching
15 staff at the schools I am looking at have less recent data about my performance and my potential
16 for improvement and so my recruiting options are more limited now than they were before.

17 14. The potential for roster limits has greatly impacted my teammates, too. They are
18 nervous about the potential cuts. Many of them struggle to practice because they are so worried
19 about their futures at Vanderbilt.

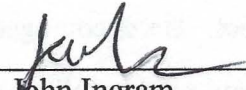
20 15. I have worked incredibly hard to get to the top level of tennis. I am a very strong
21 doubles player, and Division I tennis develops some of the best doubles players in the world. I
22 do not want to lose my opportunity to work on my game while getting a great education. Getting
23 cut from the team poses a hard choice: quit playing college tennis and stay at Vanderbilt where
24 I am very happy, or transfer to another school and start all over and continue playing tennis. I
25 don't want to be forced into making such a big decision by arbitrary NCAA rules.

26 16. Further, tennis has been my identity for my entire life. If I am cut from the team
27 because of the limits, but choose to stay at Vanderbilt, I will have to rearrange my entire life.
28 Doing this to tennis players is ripping their entire worlds apart. Many athletes' best friends will

1 be cut from teams. And for what? These roster limits do not serve a purpose. They have no
2 place in this settlement.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Nashville, Tennessee
5 January 26, 2025

6
7 
8 John Ingram
9 NCAA ECID No. 2303800157
10 2103 Cypress Point West
11 Austin, Texas 78746
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Taylor Inouye
5200B Ravenna Ave NE
Seattle, WA 98105

January 26th, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Taylor Inouye. I am a current Division I athlete at University of Washington and my NCAA ECID number is 2311152465. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Taylor Inouye

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF TAYLOR INOUE**

9 I, Taylor Inouye, hereby declare as follows pursuant to 28 U.S.C. §1746:

10 I am a sophomore at the University of Washington and a member of the NCAA
11 Division I women’s rowing team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.
13

14 In September of 2023, I attended a “UW Women’s Rowing Informational Session,” with
15 at least 100 other women who had no clue what rowing was. Prior to this, I had no idea what
16 rowing really was or that it was something I could have an opportunity to pursue at a collegiate
17 Division 1 level. Following this session, I went through a four-week tryout period where I
18 learned how to erg, row, and eventually cox. At the end of this period (end of October 2023), I
19 was one of 14 women selected to join the Class of 2027 on the Women’s Rowing Team as a
20 walk-on coxswain.
21

22 At the start of my freshmen season, I was one of six freshmen coxswains, and being the
23 only one from this group to never row prior to the start of college, I had a lot of groundwork to
24 make up if I wanted a shot at being anywhere near the level of my peers. When an injury took
25 me out for one month in January of 2024, I had even more work to catch up on and felt like I
26 would never be able to be at the same level as my teammates. But with motivation from my
27 teammates, help and advising from the varsity members of the team, and asking as many
28

1 questions as I possibly could, I realized that I could make my goals into a reality. After lots of
2 good and bad practices filled with learning experiences, feedback from coaches and teammates,
3 and self-reflection and growth I started finding a groove and gained some self-confidence in
4 myself as a person and coxswain.

5
6 Come May 2024, end of the school year, the Pac-12 Selection list had come out and
7 before reading it I already had assumed my name wouldn't be on there. To my surprise, listed
8 amongst the names was "Inouye." In those 3 months after my injury, I had gone from the bottom-
9 ranked coxswain of my class with the least experience and knowledge, to top three in my class
10 to make these selections. And when only three coxswains from our class were invited back for
11 the 2024-2025 season, I was grateful and fortunate that I was one of those three.

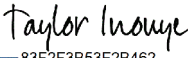
12
13 Had the roster limits been in class for my freshman year, those three months of growth,
14 learning, and development would have never happened. I wouldn't have made the coxswain I
15 was at the start, and I never would have known my potential that I have now. Since then, I have
16 grown so much as a coxswain, athlete, and person. I have raced with the varsity team, learned to
17 cox a new type of shell, worked with Olympians on our team, and grown new relationships with
18 coaches and teammates I never would have thought possible. Our large team, and getting to work
19 with so many people either new or heavily experienced in rowing really helped me progress as
20 a coxswain and gave me a wonderful environment to learn and grow in.

21
22 Going to that informational session changed my life in ways I never would have thought
23 possible. Those three months of growth transformed me as a person and showed me how capable
24 I am with hard work and dedication. I am forever grateful for the experiences I've had the
25 opportunity to live through and for the walk-on culture at UW. It is so powerful to be surrounded
26 by so many other coaches (some who just went to the Paris 2024 Olympics) who were walk-ons
27 like myself. It shows that with enough time and dedication given, we can develop into fabulous
28

assets to our team. This growth and development comes with time, time that the roster limits would strip.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 26, 2025
Seattle/King, Washington

Signed by:

83F2F3B53F2B462...
Taylor Inouye
NCAA ECID No. 2311152465
5200B Ravenna Ave NE
Seattle, WA 98105

Emelia Jordan
4330 Little Canoe Channel NE
McCarty Hall 571
Seattle, WA 98195

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Emelia Jordan. I am a current Division I athlete at University of Washington and my NCAA ECID number is 2209669676. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Emelia Jordan

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

7
8 **DECLARATION OF EMELIA JORDAN**

9 I, Emelia Jordan, hereby declare as follows pursuant to 28 U.S.C. §1746:

10 1. I am a 2028 at the University of Washington and am a member of the NCAA
11 Division I women's rowing team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 2. I spent my high school career and a gap year preparing to be a college athlete.
14 Gradually, building my training hours to upwards of 18 hours a week - 9 practices a week. I
15 was working towards the goal of earning a spot on a Division I cross-country ski team, my
16 main sport prior to rowing. During the winter I would travel most weekends to reach the most
17 competitive races, sometimes making the 9 hour drive back and forth between Rochester, NY
18 and northern Maine 3 weekends in a row. The time commitment and dedication to sport caused
19 me to miss out on birthday parties, graduation parties, and regular weekend hangouts with
20 friends. Despite these sacrifices, I gained mentors, a community, a love of sport, and a team as
21 close as family.

22 3. I had success on the local, regional, and national cross-country skiing stage. As
23 an 8th grader, I was the anchor of the sectional and then state winning relay, the first State
24 Championship victory for the Brighton High School nordic ski team since its founding 85
years prior. As a team we continued to dominate the section and the state through the 2022

1 season. My freshman year, I qualified to attend the US Cross-Country Junior National
2 Championship. I first attended the event at age 16, my best result was 31st place out of 98 of
3 the best U18 athletes in the nation. I attended Junior Nationals again as a top member of the
4 Mid-Atlantic Team in 2023, and made my final trip in 2024 as part of the Intermountain
5 Division Team, the second best division in the country.

6 4. Despite my success in this sport, I still struggled with college recruitment.
7 Cross-country skiing has very limited collegiate opportunities. To the best of my knowledge,
8 there are only 21 teams in the country, each with limited rosters and resources to provide to
9 athletes. Due to this, most teams can only support 2-3 athletes per admission cycle and can
10 accept a few more who gain admittance to the school without assistance. I had several offers
11 for spots on teams if I was able to gain admission to elite Ivy League and comparable small
12 liberal arts schools. In the end, after a several year long process, my last opportunity fell
13 through, the coach had more athletes than expected get into the school on their own. The coach
14 sent me a very apologetic email stating that her team was beyond full, she was going to have to
15 make cuts in the upcoming season, and could not accommodate more athletes. My recruiting
16 story is not uncommon for the sport of cross-country skiing, the availability of roster spots
17 simply does not match the amount of talent in the nation. While grieving the loss of something
18 I loved, I chose to pivot and reconnect with my values and aspirations to find a school that
19 would fit. I had been admitted to the University of Washington, applying because I had seen
20 pictures of the campus online and had read about the university's pre-med program. I attended
21 admitted students day and fell in love with the school. I researched the very well-known
22 University of Washington Rowing walk-on program. Excited by the prospect of trying a new
23 sport and the strong reputation of Washington academics, I sent in my deposit.

24 5. In a recent team meeting, head coach Yasmin Farooq described how the

1 incoming roster limits would affect Washington Rowing. She informed us that on December
2 1st 2025, the roster will be cut to 68. Our current roster consists of over 100 athletes. As a
3 walk-on, this cut in the roster could eliminate my opportunity for development and eventually
4 attend conference and NCAA championships. I have been rowing for 6 months, while some of
5 my teammates have been rowing for 5-10 years. The proposed roster cut does not take into
6 account the nature of a sport like rowing, where athletes need years to develop their skill and
7 fitness. The sport also requires a unique format of team building, both within a boat of eight,
8 and from inter team competition for seats in the competing boats. With roster cuts the time
9 needed for each individual athlete and for the team as a whole to develop will be far too
10 limited. This powerful team has built its famed history in large part from walk-on athletes. The
11 proposed roster limit of 68 will drastically impact this development for me and others like me.
12 The limit also leaves little room for injury, illness, or strategic placement in filling the 53
13 available spots to compete in Big 10 Championships.

14 6. These proposed roster cuts have spiked anxiety for all members of the team. It is
15 challenging to show up to practice twice a day and continue to strive for a goal that may not be
16 available to you in 11 months. I am discouraged when I see older team members, who I idolize,
17 brought to tears by the incoming changes. I came to the sport looking for a new place to work
18 hard and compete against some of the best athletes in the nation. I was not expecting to receive
19 compensation for the hours I spend in the boathouse each day. I was only hoping my hard work
20 would be rewarded by the feeling of being a part of something challenging, empowering, and
21 fun.

22 7. If I am cut from Washington Rowing I will lose much of what supports my daily
23 life. I will lose access to academic counseling and tutoring which helped me make the Dean's
24 List in my first quarter. I will lose access to the 3 free meals a day, which have maintained my

1 ability to push to my physical and academic limits. And worst of all, I will again have to
2 grapple with my identity and find a new way to feel fulfilled as an athlete. I will lose my new
3 found family, my best friends, and my coaches who all believe in me.

4 8. I hope the extreme loss and mental health risk that these roster cuts will cause is
5 taken into consideration. I have personally experienced the grief caused by losing the ability to
6 continue a sport that is a foundational part of my identity. I experienced that loss due to roster
7 limits. I was able to emerge from that grief by putting the same energy towards a new sport,
8 and now my place in sport may be taken away again. Some NCAA priorities as listed on their
9 website are, “coordinate and deliver safe, fair, and inclusive competition”, “promote innovation
10 that improves health, safety and performance”, and “inspire the next generation of athletes”.
11 The proposed roster cuts would dramatically undermine each of these priorities. Roster cuts of
12 women’s rowing teams and other collegiate sports teams are the opposite of fair and inclusive.
13 The cuts will cause a decrease in safety and performance of all the teams affected. Dramatic
14 decreases in the number of opportunities available will discourage and limit the next generation
15 of athletes. To maintain the integrity of NCAA athletics and the culture of college sport, there
16 must be no roster cuts.

17 I declare under penalty of perjury that the foregoing is true and correct.

18 Dated: Seattle, Washington

19 January 26, 2025

Emelia Jordan

Emelia Jordan
NCAA ECID No. 2209669676
4330 Little Canoe Channel NE
McCarty Hall 571,
Seattle, Washington 98195

Lindsay Juhlin

1007 Lafayette St.
Williamsburg, VA 23185

January 27, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken,

My name is Lindsay Juhlin. I am a current Division I athlete at William & Mary; my NCAA ECID number is 2001783849. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,

Lindsay Juhlin

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF LINDSAY JUHLIN**

9 I, Lindsay Juhlin, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman at the College of William and Mary and a member of the NCAA
11 Division I Women's Swim team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 2. Our coaches have explained to us that roster limits, if implemented, will cause
14 our team to incur and suffer from cuts of four of our teammates. We do not yet know if these
15 will be athletes currently on our team, incoming freshmen, or a combination. We do not want
16 this and feel we should not have to worry about losing teammates or have any concerns
17 surrounding our own position on the team. Added stress does not help performance or team
18 spirit. Nor will a limited roster benefit our team.


19 3. We function as a team in and out of the pool. We eat together, study together,
20 relax together, and live together; we have strong mentoring systems on our team and pride
21 ourselves on helping one another in and out of the pool; we are a tight, supportive group. We
22 worked incredibly hard throughout high school in order to have this opportunity; we all want to
23 remain on this team and at our school, together. We do not feel roster limits help our team or our
24 sport, but they will negatively impact those who are cut and our team at large.

25 4. Please do not approve the roster limits in the *House v. NCAA* settlement.
26
27
28

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Williamsburg, VA

January 27, 2025

Signed by:

E42D36C24CF14FF
 Lindsay Juhlin
 NCAA ECID No. 2001783859
 1007 Lafayette Street
 Williamsburg, VA 23185

Hannah Justice
1924 Kings Manor Court
Matthews, NC 28105

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Hannah Justice. I am a high school student aspiring to be a future Division I athlete, and a member of the Injunctive Relief Class. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Hannah Justice

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF HANNAH JUSTICE**

9 I, Hannah Justice, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am 14 years old and am in 9th grade. I have been competing as a swimmer since
11 I was 5 years old and hope to compete on a Division I college team.

12 2. I understand that the settlement in this lawsuit will govern NCAA Division I
13 sports for the next decade, which is when I will be in college. I therefore am a class member
14 who could be affected by the terms of the settlement. I object to the settlement for the reasons
15 stated below, both for myself and for other class members like me.

16 3. I train 18 hours a week, on average. I give my life to this sport as I have chosen
17 to exclude many social and other extracurricular activities from my life so that I can focus on
18 swimming. I am the oldest of 6 children and my parents make daily time, money, and energy
19 sacrifices so that I can swim.

20 4. My best events are the 1650, 1000, 800, 500, and 400 free. I believe that with the
21 progress I am making and the direction I am heading, I can earn a scholarship to swim at a
22 Division I institution with my specialty in long-distance freestyle events, which will be crucial
23 for my large family, as my parents cannot fund my college education.

24 5. My mother played soccer and my father played football at Wake Forest
25 University. They would not have been able to attend such a prestigious university without their
26 scholarships. While my father earned a lot of money for the school at the time through his name,
27 image, and likeliness, he believes that the scholarship he received was more than enough for any
28 benefit he provided to the school. My father also went on to play in the NFL and now he and my

1 mother serve out community through their small fitness studio.

2 6. College sports teams should not have roster limits imposed because the benefits
3 that college athletics have on young adults is unmatched. From the walk-on to the full-
4 scholarship athlete, young adults learn hard-work, discipline, time-management, self-sacrifice,
5 and are overall better contributors to society through their experience in college athletics.

6 7. Please, Judge Wilken, consider my appeal. I am not the best of the best when it
7 comes to swimming, but I am doing the best I can to be the best I can be. I hope and pray that I
8 can swim in college one day. You can still make that a reality for me and my family.

9 I declare under penalty of perjury that the foregoing is true and correct.

10 Dated: Matthews, North Carolina

11 January 28, 2025



12 Hannah Justice
13 1924 Kings Manor Court
14 Matthews, NC 28105
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Hope Justice
1924 Kings Manor Court
Matthews, NC 28105

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Hope Justice. I am a middle school student aspiring to be a future Division I athlete, and a member of the Injunctive Relief Class. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Hope Justice

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF HOPE JUSTICE**

9 I, Hope Justice, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am 12 years old and in 6th grade. I have been competing as a swimmer
11 since I was I was 5 years old and hope to compete on a Division I college team.

12 2. I understand that the settlement in this lawsuit will govern NCAA Division I
13 sports for the next decade, which is when I will be in college. I therefore am a class member
14 who could be affected by the terms of the settlement. I object to the settlement for the reasons
15 stated below, both for myself and for other class members like me.

16 3. I train 15 hours a week, on average. I give my life to this sport as I have chosen
17 to exclude many social and other extracurricular activities from my life so that I can focus on
18 swimming. I am the second oldest of 6 children and my parents make daily time, money, and
19 energy sacrifices so that I can swim.

20 4. My best events are the 50 free, 50 butterfly, and the 50, 100, and 200 backstroke. I
21 believe that with the progress I am making and the direction I am heading, I can earn a
22 scholarship to swim at a Division I institution with my specialty in short-distance freestyle events,
23 which will be crucial for my large family, as my parents cannot fund my college education.

24 5. My mother player soccer and my father played football at Wake Forest
25 University. They would not have been able to attend such a prestigious university without their
26 scholarships. While my father earned a lot of money for the school at the time through his name,
27 image, and likeliness, he believes that the scholarship he received was more than enough for any
28 benefit he provided to the school. My father also went on to play in the NFL and now he and my

1 mother serve out community through their small fitness studio.

2 6. College sports teams should not have roster limits imposed because the benefits
3 that college athletics have on young adults is unmatched. From the walk-on to the full-
4 scholarship athlete, young adults learn hard-work, discipline, time-management, self-sacrifice,
5 and are overall better contributors to society through their experience in college athletics.

6 7. Please, Judge Wilken, consider my appeal. I am not the best of the best when it
7 comes to swimming, but I am doing the best I can to be the best I can be. I hope and pray that I
8 can swim in college one day. You can still make that a reality for me and my family.

9 I declare under penalty of perjury that the foregoing is true and correct.

10 Dated: Matthews, North Carolina
11 January 28, 2025



12 Hope Justice
13 1924 Kings Manor Court
14 Matthews, NC 28105
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Brianna Kappeler
343 Palomino Hill Ct.
Chesterfield, MO 63005

January 29, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Brianna Kappeler. I am a current Division I athlete at Missouri State University and my NCAA ECID number is 2106227840. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2024.

Sincerely,

Brianna Kappeler

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF BRIANNA KAPPELER**

9 I, Brianna Kappeler, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman at Missouri State University. I was a member of the Division I
11 women's soccer team until December 2024 and thus I am a member of the Injunctive Relief
12 Class. I object individually and on behalf of the class.

13 2. I have been playing soccer since I was 3 years old. I joined my first club team
14 when I was 7 years old and have played competitively for a decade. Before college, I played 7
15 seasons for the St. Louis Scott Gallagher Soccer Club, which competes in a national league. I
16 competed in both the 2021 and 2022 Elite Clubs National League Championships.

17 3. I also played for the Marquette High School soccer team, where I started all four
18 seasons. I led Marquette High to its first ever conference championship as a junior and was an
19 all-conference first-team selection that year.

20 4. Playing club soccer in a national league was an achievement in and of itself,
21 though it came with a lot of sacrifice. I practiced 6 of the 7 days a week. Most weekends, I
22 traveled for games. I had to learn how to balance academics. I gave up the typical high school
23 experience, like school dances, in order to continue my athletic development. Beginning my
24 sophomore year, I also took the initiative in reaching out to college coaches to begin my college
25 recruitment process. My dedication resulted in a number of Division I collegiate programs
26 showing interest in recruiting me.

27 5. After visiting and considering a number of Division I programs, I decided to
28 attend Missouri State University. It was clear that Missouri State was the right choice for me

1 after my visit. The university has both a strong athletic and academic tradition, and I was
2 immediately drawn by the team's culture and competitive spirit. It was clear to me from the
3 beginning that everyone on the team is very close and that there is an open line of communication
4 between the coaches and the players.

5 6. I was fortunate enough to receive a partial athletic scholarship, which covers
6 approximately one-third of the cost of attendance for my freshman year.

7 7. Unfortunately, I tore my ACL early in the season and have been undergoing the
8 rehabilitation process since.

9 8. Although rumors about roster cuts had been going around since I arrived on
10 campus, the team did not have a meeting about the issue until after the end of our season. After
11 the NCAA tournament, our coach told the entire team that they would need to make cuts because
12 of the upcoming roster limits. Then, the week before Thanksgiving, our coach held individual
13 meetings with me, as well as two of my other teammates, to tell us we were cut from the team.

14 9. I was shocked and disappointed by the news. Since I have not even completed
15 my freshman year, I feel as though I have not had the chance to show the coaches what I am
16 capable of. Especially given that I was sidelined for much of this season due to an injury. I feel
17 as if my collegiate athletic career was abruptly cut short before I had a meaningful chance of
18 realizing my potential.

19 10. I am now faced with a lot of uncertainty about my future. If I want to continue
20 playing soccer, I will have to transfer schools. However, my injury earlier this season makes
21 transferring exceedingly difficult. I have no game film that I can show to coaches during the
22 recruitment process. Additionally, I am aware that many other schools are making similar cuts
23 and that the transfer portal will be oversaturated with hundreds of other student athletes looking
24 for a place to land after being cut. I also do not know if I will be able to transfer the class credits
25 I have taken so far, and I do not want to delay the completion of my degree. As it currently
26 stands, I am on pace to complete my degree in three years. I may end up having to stay at
27 Missouri State without the soccer team, and without my athletic scholarship.

1 11. My coach told me that I can stay on the team through the spring so that I can
2 finish my physical therapy. My partial scholarship will continue to the end of my freshman year,
3 but I would lose my scholarship after that. Being cut from the team will mean that I will have
4 to take on a significant and unexpected financial burden to complete my degree.

5 12. Being cut from the team will also mean that I will lose touch with my teammates,
6 many of whom have become my close friends as I have gotten to know them this past year. My
7 roommate, a student from England, was cut from the team as well. We had become friends, and
8 she even got to experience her first American Thanksgiving with my family this past November.
9 However, because of these roster limits, she also lost her spot on the team and had to abruptly
10 transfer schools. The prospect of losing some of the connections I have made with my fellow
11 teammates is truly disheartening.

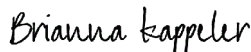
12 13. The roster limits that are a part of this settlement have resulted in a sudden end to
13 my collegiate soccer career. Despite all of the hard work and countless hours I have put in to
14 developing myself as an athlete, I was cut from my team because of something totally out of my
15 control. The roster limits are deeply unfair and I strongly object to their inclusion in the
16 settlement.

17 I declare under penalty of perjury that the foregoing is true and correct.

18 Dated: Chesterfield, Missouri

19 January ²⁹, 2025

Signed by:



B239CE1DBBCE4DE...
Brianna Kappeler

NCAA ECID No. 2106227840

343 Palomino Hill Ct.

Chesterfield, MO 63005

Kelsey Katt
107 Delaware Ave,
Williamsburg VA, 23185

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken,

My name is Kelsey Katt I am a current Division I athlete at William & Mary; my NCAA ECID number is 2101984427. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Kelsey Katt

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF KELSEY KATT**

9 I, Kelsey Katt, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a senior at William & Mary and am a member of the NCAA Division I
11 Men's and Women's Swim Team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 2. Our coaches have explained to us that roster limits, if implemented, will cause
14 our team to incur and suffer from cuts of four of our teammates. We do not yet know if these
15 will be athletes currently on our team, incoming freshmen, or a combination. We do not want
16 this and feel we should not have to worry about losing teammates or have any concerns
17 surrounding our own position on the team. Added stress does not help performance or team
18 spirit. Nor will a limited roster benefit our team.

19 3. We function as a team in and out of the pool. We eat together, study together,
20 relax together, and live together; we have strong mentoring systems on our team and pride
21 ourselves on helping one another in and out of the pool; we are a tight, supportive group. We
22 worked incredibly hard throughout high school in order to have this opportunity; we all want to
23 remain on this team and at our school, together. We do not feel roster limits help our team or our
24 sport, but they will negatively impact those who are cut and our team at large.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Williamsburg, VA

January 26, 2025

DocuSigned by:

Kelsey Katt

6E4EF672474140B...

Kelsey Katt

NCAA ECID No. 2101984427

107 Delaware Ave,

Williamsburg VA, 23185

Evan Keogh
3915 Somerset Dr.
Siesta Key, FL 34242

January ³⁰, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Evan Keogh. I am a current Division I athlete at the University of Florida and my NCAA ECID is 2105167478. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Evan Keogh

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF EVAN KEOGH

I, Evan Keough, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a sophomore at the University of Florida. Until recently, I was a member of the men's NCAA Division I Swimming and Diving team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. I have been swimming competitively since I was 7 years old. I worked extremely hard to improve in the sport, and I was competitively successful in my pre-college career. As a high school athlete, I competed for the Sarasota Tsunami Swim Team at the club level. I was also a Junior Nationals qualifier in 5 events. In the summer going into my junior year of high school, I qualified for the 2021 Olympic Trials in the 200-meter backstroke.

3. As a result of my high school accomplishments, I received recruitment interest from nearly 25 Division I programs in the summer of my sophomore year. Following a few official visits to various Division I programs, I ultimately committed to the University of Florida. I was offered a four-year athletic scholarship paying part of my tuition costs.

4. My freshman year at the University of Florida went well. I accomplished two of my best times, had an excellent training year, and was able to avoid major injuries.

5. Then, when I returned to campus early to start training, some people on the team had heard about roster limits but didn't know anything for certain. We experienced notably increased internal stress as we worried about what might be coming. In December, the athletics director informed the Swimming and Diving team that we would all have mid-season evaluation talks with our coach.

6. Soon after that, I had a meeting with my head coach and two assistant coaches, who told me that I wouldn't be on the roster for the 2025-26 team. Although they said I could be on the team for the rest of the season, if I did not plan to transfer to a different school, I should stop coming to practice immediately and I would no longer be able to race.

7. After a week and a half of deliberation following this meeting, I decided that I didn't want to transfer schools and start over as a junior in college, so I told my coaches that, given my choices, I would be retiring from swimming.

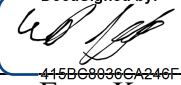
8. Getting cut from the team was devastating. After swimming for 12 years, I wanted to retire on my own terms, but instead, I was told I was done. I was proud of my times and know that they would continue to improve. Knowing I put so much effort into my sport, and I don't even have a choice about when to walk away feels unfair.

9. In addition to the stress and sadness I feel about getting cut from my team, losing my spot on the roster has also raised financial questions. The roster limit will affect my access to benefits that I rely on, such as our athletic center and my athletic scholarship. This has caused serious and unexpected added anxiety for my family and me.

10. I committed to the University of Florida because I understood that the school was making a commitment to me too: that if I worked hard and gave my best effort I would have a place on the team, an opportunity to find my potential, and an opportunity to compete on race day. The new roster limits have taken away my opportunity to compete in the sport I love. They should not be approved.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Siesta Key, Florida
January 30, 2025

DocuSigned by:

415BC8036CA246F
Evan Keogh
NCAA ECID No. 2105167478
3915 Somerset Dr.
Siesta Key, FL 34242

Calissa Kissinger
1971 University Blvd
Flames Box 205227
Lynchburg, VA 24515

January 20, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Calissa Kissinger. I am a freshman and Division I athlete at Liberty University, and my NCAA ECID number is 2106181927. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Calissa Kissinger

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF CALISSA KISSINGER**

9 I, Calissa Kissinger, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman at Liberty University and am a member of the NCAA Division I
11 women's swimming & diving team. I am a member of the Injunctive Relief Settlement Class
12 and object both individually and on behalf of the class.

13 2. I have been swimming competitively since I was 6 years old and have taken
14 lessons since I was 6 months old. Swimming has always been a significant part of my life.
15 Leading up to and during the college recruiting process, I was training 9 times a week, which
16 equaled about 17 hours a week in the water. This does not include additional time spent doing
17 dryland exercises, weightlifting, and often commuting over an hour to the pool.

18 3. In high school I had national level qualifying times and was ranked in the top 60
19 in my state for my recruiting class. In my best events, I had the twelfth, eighteenth, and thirty-
20 first fastest times in my local swimming committee.

21 4. My recruiting process began in May of my sophomore year of high school (2021)
22 and lasted until December of my gap year (2023). It was an extremely long and stressful process
23 that took a lot of effort. The type of school I was looking for changed quite a bit from the
24 beginning of the recruiting process to the end.

25 5. At first, I was not considering the possibility of going to a Division I school,
26 though I wanted to get into Liberty from the beginning. Liberty was exactly the kind of school
27 I wanted to attend for college due to its culture and how the swim and dive team foster and grow
28 that culture. I was just not confident in myself, and unsure if Division I was possible.

1 6. I reached out to the coach at Liberty. When he responded, I worked even harder
2 to improve on my times and show that I was capable of swimming competitively at a Division I
3 school like Liberty. I ended up choosing Liberty as a preferred walk-on over multiple other
4 schools that offered me spots with athletic scholarships because Liberty offered exactly the kind
5 of education and culture I wanted, as well as the opportunity to be on a team where I was going
6 to be pushed to get better every day.

7 7. During the recruiting process, the possibility of being cut never came up. All I
8 was told was that there was a possibility of earning an athletic scholarship in the future. I was
9 given the impression that even as a walk-on, the coaches did not intend to cut anyone.

10 8. The first time I heard about possible roster limits in the *House v. NCAA* settlement
11 was from vague references to it on social media and different news articles. We first heard about
12 it as a team during a team meeting after practice. According to my older teammates, before this
13 year, cuts were not because of roster limits but only if there was misconduct or a culture fit issue.

14 9. I became very nervous when I realized that roster cuts to our team are
15 mathematically inevitable if roster limits are approved with the settlement. When I started the
16 season, we had 35 women on the team. Nine will be graduating this year, and 7 have already
17 committed for 2025. That means the team must cut at least 3 of us for next season if the new
18 roster limit of 30 goes through.

19 10. The reality is that cuts would probably be even deeper. Without saying it outright,
20 our coach hinted that the team may cut even more of us to be able to accept faster transfers from
21 other schools that also have to cut their teams down to meet the roster limits. My coach has not
22 addressed the possibility of not needing to make cuts if the roster limits are not approved. He is
23 also not waiting: He is planning on making cuts after our championship meet in February.

24 11. This knowledge has taken a significant toll on myself and others on my team who
25 know they are the most likely to get cut. For myself, and many others on my team, it has taken
26 a lot of the joy out of the sport we love. Most of what I can think about is that I must perform
27 so I don't get cut. The stress and anxiety I feel has impacted my performance, which is leading
28 to even more stress at the next meet or practice to prove I am good enough to stay on this team.

1 It's a horrible downward spiral.

2 12. I already put so much work into this sport to be able to swim for this school. This
3 was especially difficult after already having to build back after not being able to swim at all for
4 months during COVID-19, then an additional year of limited and restrictive practices and meets.
5 Now, it feels like that additional work was pointless because the pressure of performing to save
6 my spot on the team has turned the thing I love into a source of pain and stress, instead of joy.

7 13. If I am cut, I will lose the support that Liberty provides to support their athletes.
8 I will lose access to dedicated academic counseling and tutoring, dining options created
9 specifically with the nutrition needs and schedules of athletes in mind, and free specialty medical
10 care provided for the athletes at Liberty. Most importantly, though, I will lose the ability to
11 compete in the sport I love for the school my heart was absolutely set on.

12 14. I will not necessarily completely lose the relationships I have built on the team,
13 but they will not be the same when I am not spending upwards of 4-6 hours a day with them
14 training and talking about nearly anything that comes to mind. I was already stripped of my
15 close relationships during the pandemic, and the roster limits are threatening to repeat that
16 loneliness and isolation all over again.

17 15. If I am cut, transferring will be difficult with the degrees I am majoring in. Even
18 if I drop one of my degrees, I have limited options of schools that will permit me to continue my
19 degree and swim. I know there is not a single school outside of Liberty that has the kind of
20 culture my team has, and it's really the only one I want to be a part of at a college. I may end
21 up staying at the school and trying to compete for a club in the area, or I may go back home and
22 back to the club I used to compete for and complete one of my degrees online. That might be
23 the only way I can continue to swim through college. But if I do that, it will basically be the end
24 of my college experience.

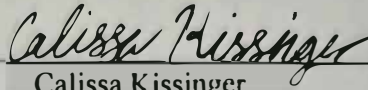
25 16. My plea to the Court is to reject the roster limits. Roster limits only serve to harm
26 non-revenue sports. The idea of roster limits is only causing pain and harm to both coaches and
27 athletes at the Division I level. Even with every other aspect of this settlement, non-revenue
28 sports will already lose much of their funding, which will cause more financial stress on the

1 funding which will cause more financial stress on the student-athletes so there is no need to cause
2 more stress and hurt by forcing teams to cut their hard working athletes.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Dated: Lynchburg, Virginia

5 January 20, 2025



Calissa Kissinger

NCAA ECID No. 2106181927

1971 University Blvd

Flames Box 205227

Lynchburg, VA 24515

Taylor Jane Klein
645 Hempstead Place
Charlotte, North Carolina 28207


January 30, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Taylor Klein. I am a high school student aspiring to be a future Division I athlete, and a member of the Injunctive Relief Class. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,

Taylor Klein

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF TAYLOR KLEIN**

9 I, Taylor Klein, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am 17 years old and in 11th grade at Charlotte Country Day School. I have
11 been competing as a swimmer since I was 8 years old. I competed as a field hockey player
12 through 8th grade, but after starting high school I stopped playing field hockey. I wanted to focus
13 on swimming to prepare for recruiting and participating in D1 athletics in college.

14 2. I understand that the settlement in this lawsuit will govern NCAA Division I
15 sports for the next decade, which is when I will be in college. I therefore am a class member
16 who could be affected by the terms of the settlement. I object to the settlement for the reasons
17 stated below, both for myself and for other class members like me.

18 3. I practice 6-7 days per week and on average about 3 hours per day. I swim about
19 45 minutes from my house, so I spend an extra 1.5 hours a day commuting to practice. I have
20 given up a lot of things for swimming. I am unable to attend a lot of family holidays,
21 graduations and more. I have also given up social time with friends at school, but it's worth it,
22 because I have gotten so much from the sport and plan on receiving even more in hopes of
23 competing at the D1 level in college.

24 4. I have just recently "taken off" in swimming. I was a late bloomer, and my
25 successes have mostly happened later in high school. I have qualified for Junior National
26 Championships (and scored), US Open Championships, and USA National Championships. I
27 am a conference and state champion for my high school and have both school and state records
28 in swimming.

1 5. Why do I swim? I love swimming and I love everything that it has given me.
2 My mother, father, grandfather, brother, cousin and aunt have all competed in college
3 athletics. They have always encouraged our family to play sports and aspire for collegiate
4 opportunities. My family has always shared the many positive things that came from sports,
5 especially college sports. Structure in schedule, aspiring to always do better, learning how to
6 deal with failure, learning how to deal with success, learning how to work with others, and
7 learning how to be coached in different ways. My best friends and role models are all
8 competitive swimmers – many of my role models are D1 collegiate athletes.

9 6. I believe having roster limits will destroy youth sports and developing athletes. I
10 believe that many families won't see the purpose if there are no long-term opportunities for
11 growth. I believe roster limits will impact the mental health of current athletes and future
12 athletes. If current athletes are stripped of their current spots, they will most likely find it hard
13 to find new ones, and will lose all support they were promised, from academic support, athletic
14 support, mental health support and professional development support preparing for post college.

15 7. Please remove roster limits from this and allow for athletes to participate. Allow
16 current athletes to be grandfathered into the rosters they signed on with, and allow future
17 athletes to participate no matter what the numbers are.

18 I declare under penalty of perjury that the foregoing is true and correct.

19 Dated: Charlotte, North Carolina
20 January 30, 2025

Taylor Klein

Taylor Klein
645 Hempstead Place, Charlotte, NC

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF JAKE KLUVER**

9 I, Jake Kluver, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am writing to formally object to the recent decision to impose roster limit cuts
11 for collegiate golf programs. As a former collegiate golfer at Creighton University from 2020 to
12 2024, I’ve witnessed how larger teams foster a competitive, growth-driven environment.
13 Reducing team sizes would limit opportunities for players to push one another, slow
14 development, and ultimately hinder the overall competitiveness of the sport. Especially for
15 programs in “mid-major” conferences that rely on larger roster sizes to build a more competitive
16 team.

17 2. In golf, internal competition is crucial. Larger teams create an environment where
18 athletes are consistently challenged to improve, both in practice and competition. Cutting rosters
19 would stifle this dynamic and limit the potential for programs to develop depth, which is essential
20 to long-term success and growth

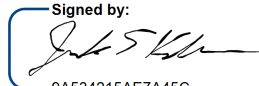
21 3. Collegiate golf should be about nurturing talent, building team strength, and
22 promoting competition, not restricting it. I urge you to reconsider this decision to ensure the best
23 possible environment for student-athletes to thrive. Schools and coaches should be making
24 decisions that affect their programs, not NCAA committees.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Omaha, Nebraska

January 29, 2025

Signed by:



9A634245AE7A46C...

Jake Kluver

NCAA ECID No. 2001780023

1415 Cuming St, Apt 221

Omaha, NE 68102

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF LUKE KLUVER**

9 I, Luke Kluver, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am writing to express my concerns regarding the NCAA's decision to impose
11 roster limits for collegiate golf programs. I am currently a professional golfer and as a former
12 Division I golfer at the University of Kansas and the University of Oklahoma, I have personally
13 experienced the profound impact of being part of a collegiate team—an experience that I fear
14 will be diminished for many aspiring student-athletes under these new restrictions.

15 2. Firstly, these roster limits could unfairly disadvantage local athletes who may not
16 have the same opportunities to showcase their talent. Smaller programs often serve as a platform
17 for local players to develop and thrive. By imposing limits, the NCAA risks reducing access for
18 talented athletes from surrounding communities, many of whom dream of representing their
19 hometowns on a collegiate stage.

20 3. Additionally, the ability to walk on to a collegiate golf team has historically been
21 a gateway for countless players to prove themselves. Walk-ons often bring passion, grit, and a
22 relentless work ethic that can elevate a team's dynamic. Curtailing these opportunities not only
23 undermines their value but also narrows the pipeline for talent to emerge outside of traditional
24 recruiting pathways.

25 4. Lastly, limiting team rosters impacts more than just competition—it affects the
26 camaraderie that is at the heart of college athletics. The bond formed between teammates goes
27 beyond the golf course; these are friendships and brotherhoods that last a lifetime. With fewer
28 players allowed on rosters, the team environment risks becoming more transactional and less

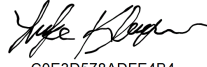
1 inclusive, denying many young athletes the chance to experience one of the most cherished
2 aspects of college sports.

3 5. Collegiate golf is about more than just wins and losses. It is about fostering
4 opportunities, building relationships, and shaping individuals into leaders both on and off the
5 course. I urge the NCAA to reconsider these roster limitations to preserve the integrity,
6 inclusivity, and developmental nature of college golf.

7 I declare under penalty of perjury that the foregoing is true and correct.

8 Dated: Norfolk, NE

9 January 28, 2025

DocuSigned by:


C0E3D578ADFE4B4...

Luke Kluver

NCAA ECID No. 1808261773

607 Charles St

Norfolk, NE

Amadeusz Knop
2287 SW 38th DR, Apt 62
Gainesville, FL 32607

January 25, 2025

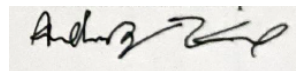
Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Amadeusz Knop. I am a current Division I athlete at the University of Florida and my NCAA ECID number is 2003830154. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Amadeusz Knop

A handwritten signature in black ink, appearing to read "Amadeusz Knop", is written over a light gray rectangular background.

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7 **DECLARATION OF AMADEUSZ KNOP**

8 I, Amadeusz Knop, hereby declare as follows pursuant to 28 U.S.C. § 1746:

9 1. I am a sophomore swimmer at the University of Florida and a member of its
10 men's NCAA Division I Swimming and Diving Team. I am a member of the Injunctive Relief
11 Class and object individually and on behalf of the class.

12 2. I started swimming competitively at the age of ten. By the time I was 13 years
13 old, I was competing in multiple state and national events.

14 3. In high school, I trained year-round for about 20-22 hours each week. I rarely
15 went on vacations and rested about three weeks each calendar year. That hard work paid off in
16 my meet results. I won multiple events at the Florida State Championships, at the Class 4A
17 level, which is the highest level. I was a finalist several times in multiple events in the U.S.
18 Open Championships. I have also competed in the finals in multiple events in the U.S. Nationals
19 and Winter Juniors competitions—national events for athletes ages 18 and under. In 2021, I
20 qualified for the Olympic Trials. I also competed in the Poland Nationals for 17 and 18-year
21 olds, where I earned second place in two events.

22 4. Coaches from Division I schools started recruiting me during the summer before
23 my junior year of high school. I was contacted by almost every Division I school and I visited
24 four of them. I was offered scholarships or financial assistance that would cover my full tuition
25 at three of them, including Harvard and Florida.

26 5. I ultimately accepted an offer at Florida. While being able to graduate debt-free
27 was an important factor in my decision, I also chose Florida because out of all the schools I
28

1 visited, I thought it was academically excellent and had the most rigorous swimming program.

2 6. I trained hard throughout my first year at Florida with my teammates, and I looked
3 forward to sophomore year on the team. Then, in a meeting with my head coach and head
4 assistant coach this past fall, I was told I would not have a spot on next year's team due to the
5 roster limits. They suggested that I transfer to another school or stay at Florida and not swim.

6 7. If I stay at Florida and I don't swim, my coaches could not guarantee that I would
7 receive the same financial aid package. I also hope to qualify for another Olympic Trials, but if
8 I'm not practicing with a college team I'm much less likely to be able to get the training I need
9 to achieve that goal.

10 8. Had I not prioritized swimming in my decision about college, I likely would have
11 chosen to attend Harvard because I liked the school and the academics. If I tried to transfer to
12 Harvard now, my degree credits would not transfer and I would have to start my college career
13 all over again.

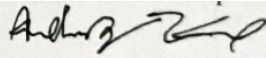
14 9. The new roster limits have made me feel like I'm not valued as a whole athlete
15 and person, and that instead I'm just another number to the NCAA and my school.

16 10. In my opinion, roster limits will harm college-level swimming overall. Without
17 the roster limits, top Division I programs have the opportunity to bet on student athletes who
18 haven't yet realized their potential. I've seen this happen with some of my teammates— they
19 began college without having competed at the top level, but in the program they developed into
20 championship-winning swimmers. With the roster limits, those opportunities to develop student
21 athletes will be eliminated.

22 11. I have dedicated my life to my sport. The roster limits threaten my ability to even
23 continue competing in the sport I love, much less to continue on to a possible Olympic career.
24 The roster limits should not be included in the settlement.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Dated: Gainesville, Florida
3 January 25, 2025



Amadeusz Knop
NCAA ECID No. 2003830154
2287 SW 38th DR, Apt 62
Gainesville, FL 32607

Ellen Natalia Koselka
5209 39th Ave NE
Seattle, WA 98105

January 26th, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Ellen Natalia Koselka. I am a current Division I athlete at University of Washington and my NCAA ECID number is 2003830179. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Ellen Natalia Koselka

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF ELLEN NATALIA KOSELKA

I, Ellen Natalia Koselka, hereby declare as follows pursuant to 28 U.S.C. §1746:

1. I am a senior at the University of Washington and am a member of the NCAA Division I women's rowing team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. Growing up to a family of successful D1 swimmers, I always knew that I wanted to play a D1 sport. D1 athletics runs in my family, from my grandfather running track at Michigan to my mom and dad swimming at Notre Dame and my big sister swimming at Michigan. For much of my life, I trained as a swimmer alongside my triplet siblings. By high school the three of us branched out to separate sports, me to rowing, my sister to running and my brother to swimming. Outside of school and chores on my family farm, rowing was my life in highschool, and I wouldn't have had it any other way. While missing homecoming dances and school prom for away races, I learned lessons in resilience, and felt the value of hard work. Through rowing, I gained a special kind of toughness only hands torn up by blisters; 2k time trials in freezing rain, and grueling winter erg training will teach you. During my four years I rose from the bottom of the roster (on a very competitive high school team—consistently top two at midwests) to the very top, earning myself a reputation for being small and scrappy, but the fiercest competitor on the course.

1 3. By the time I was a senior I had earned multiple medals at the Michigan State
2 Rowing Championships and the Midwest Regional Championships. I had also earned silver
3 medals at the Canadian Scholastic National Championships and US Scholastic National
4 Championships regattas and had proven myself to be a capable and quickly rising competitor at
5 summer international competitions. I was awarded “most improved” twice (freshman and
6 sophomore year) and was recognized as the team’s MVP with the “Columbia Blue Crew
7 Award” during my junior and senior years. I was elected captain all three seasons of my senior
8 year.

9 4. While my hard work and dedication had seen me become the top rower on my
10 team, I still had never competed on the US junior national team. At 5 '9" and 135 lbs, I was
11 considered small for a college rower and though I was extremely strong (earning my
12 highschool record for weight efficiency), few top collegiate programs gave me many looks. It
13 was also the height of the COVID19 pandemic and I had no idea how to get recruited for
14 rowing. Several lower caliber D1 heavyweight programs and a couple lightweight programs
15 recruited me, but I had my sights set on doing the same thing I’d done in highschool—working
16 hard to rise from the bottom to the top of a highly competitive and successful team—I reached
17 out to the University of Michigan (as an Ann Arborite, it felt like a natural choice), and the
18 coaches encouraged me to walk on. I spent my freshman year at Michigan and made
19 significant improvements on my erg scores, but with arrogant coaches who didn’t put stock
20 into long term development of young female athletes like me (data shows female athletes don’t
21 see their peak until their late twenties—rowers will often continue improving through their mid
22 to late 30s), I was cut (alongside all but 5 of my freshman teammates) after my freshman year.
23 Not wanting to give up on my goal of improving at a top program, I entered the transfer portal
24 and was recruited by the University of Washington, one of the most dominant programs in the

1 country. At Washington I found coaches who saw the potential that I knew I had. They offered
2 me an opportunity to develop amongst some of the best rowers in the world. Most of all, they
3 offered me an incredible team full of young women who had stories just like mine. I knew
4 immediately that it was the right place for me and am forever thankful for the opportunity I
5 received to row here. I know now that I owe this opportunity, in large part, to the lack of caps
6 on the team roster that makes room for hard working people like me, who are willing to travel
7 far from home, without a rowing scholarship, for the chance to pursue their dream.

8 5. I initially learned about the proposed roster limits from my triplet sister who
9 runs at Michigan. Having redshirted her freshman year, she was disappointed because the new
10 roster cap of 15 for track and cross country would make opportunities extremely competitive
11 and make it very unlikely that she'd be offered a 5th year since injuries slowed her progress in
12 her first 4 years. My coaches at Washington introduced our team to the rowing roster cap
13 proposals in a recent team meeting because they wanted to be transparent about how it would
14 affect our team. While 68 may seem like a large number, it would uniquely upset the current
15 opportunities available to walk-on athletes in rowing. It would also create an uncomfortable
16 waiting period where athletes training for the team for several months could eventually find out
17 they were cut as late as Dec 1. That idea is upsetting as it means that lower recruited athletes
18 (like I was initially) would exist in a sort of second tier to the athletes on the rest of the team
19 who would not be waiting to find out if they would make it or not. The second tier athletes
20 would likely get denied meals and gear (all the typical student athlete perks) that their more
21 highly recruited counterparts would be given, while still doing the same 20+ hour a week
22 training. What normally is a 2-week tryout period would turn into 3 months. I weathered
23 tryouts at Michigan, and I know how it feels to be treated as second tier. Washington's culture
24 is one of the best in the country, and yet it still would be a horrible experience. I can not

1 imagine how it would be at other schools, and I would not wish that upon anyone.

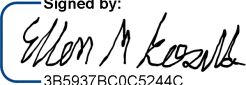
2 6. I do believe this is taking a toll on my teammates because there are many who
3 realize that if this settlement passes they will inevitably be cut. The standard, which is already
4 extremely high, may become higher. I have improved significantly while at Washington and
5 am likely not in a position to be cut (I plan to take a 5th year). Any hiccup though, like a new
6 injury, could shake everything. With a roster cap of 68, there is no room for people rehabbing
7 from injury to have a spot saved for them. For me, the situation adds motivation, not fear. For
8 others, it may feel more bleak. Having trained back from a hamstring injury late this summer
9 and been threatened with being cut this fall if I didn't hit a certain 6k time (because coaches
10 assumed I'd lost a lot of fitness), I know that even great and wellmeaning coaches can cause
11 terrible harm to an athlete's well being with new cuts and standards like the ones that will
12 inevitably be imposed if the settlement passes. I ultimately PR'd on that 6k and beat the time
13 by a substantial margin, but that will not be the reality for everyone. Inevitably a lot of
14 deserving young people who rightly believe they can develop into top athletes on this team will
15 be served up ultimatums that are unfair and **avoidable**.

16 7. I would ask that the court consider the harm that roster limits will impose on
17 young developing college athletes. Most athletes, particularly young women, do not reach their
18 peak growth years until well into their college years and beyond. If coaches, or the system
19 itself— by way of never admitting them—close doors for them to continue to pursue their sport
20 in these years, the effects will be farreaching and disasterous. I feel that this settlement
21 considered only a fractional number of athletes when reaching its ultimate decision and failed
22 to consider the countless others whose lives are shaped by their collegiate athletic experiences,
23 but get little recognition for the work they do. College athletics in the United States are more
24 than football and basketball, they are also a uniquely pivotal development ground for the

Olympians of the future. Olympic women's rowers often don't peak until their mid 30's. These future stars frequently emerge, not as junior national team members in high school, but as walk-ons at high level university programs that gave them a spot on their roster to develop. Think of all the harm that this settlement will do to more than 20,000 collegiate athletes who spent their lives, up to this point, working to be on the D1 program they are on now, but will be cut next year if the settlement passes. Think of the women who fought for decades for Title IX protections only to have them completely undercut, 53 years later, when a faulty settlement asked Universities to somehow fulfill their obligations while also upholding inherently unequal roster quotas. College sports, at their core, are about giving athletes a competitive environment within which to develop. With each decision like this, that prioritizes money over that prized ideal, the very system of college athletics is undermined.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Seattle, Washington
January 26th, 2025

Signed by:

3B5937BC0C5244C

Ellen Natalia Koselka
NCAA ECID No. 2003830179
5209 39th Ave NE Seattle, WA 98105

James Kotowski
162 Riverside St. Apt. 2
Lowell, MA 01854

January 15, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is James Kotowski. I am a current Division I athlete at the University of Massachusetts, Lowell and my NCAA ECID number is 2109324650. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
James Kotowski

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6 NCAA ECID No.: _____
7 Objection to Settlement Roster Limits

8 **DECLARATION OF JAMES KOTOWSKI**

9 I, James Kotowski, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. My name is James Kotowski and I am a member of the track and field team at
11 the University of Massachusetts, Lowell. I am a member of the Injunctive Relief Settlement
12 Class and object on behalf of the class.

13 2. I committed to going to UMass Lowell early on in my senior year of high school
14 in 2019. I was also accepted to the Francis College of Engineering as an aspiring Mechanical
15 Engineering student. When I decided to go to UMass Lowell, I did not have an offer to run on
16 the track and field team.

17 3. I had no Track & Field offers to any colleges. My best high school mark in any
18 event I had competed in was 150 feet in the Javelin throw after competing for one season in my
19 junior year. That year, I placed sixth at the MIAA Division 4 State competition.

20 4. I had planned to practice and train my senior year in addition to playing fall and
21 winter sports, so that I could have a chance at increasing my javelin mark from the previous year
22 and give myself a shot at making the Track & Field team at UMass Lowell. Everything was
23 going according to plan until the Covid-19 pandemic took over in early 2020.

24 5. My senior year outdoor Track & Field season was completely canceled, as well
25 as the rest of my high school experience. There were no sports, no prom, no graduation, and no
26 memories with my childhood friends. My plans had taken a hard turn, and I was forced to adapt.
27 Stuck in my house with nothing to do, I could have given up and just played video games and
28 slept through the pandemic until it was time to go to college. Instead, I took advantage of the

1 small home gym my dad has used for years with a set of dumbbells and a bench.

2 6. I emailed UMass Lowell in hopes of being able to try out in the following fall
3 given that I expected to be on campus, and I received a response saying they would give me a
4 chance when the fall semester started, so I got to work. I spent my spring and summer getting
5 stronger by running and lifting and even invested a good chunk of money to buy my own javelin.
6 A week before I was set to move into my dorm at UMass Lowell, I received an email that I
7 would need to stay home and complete my first year of college online, which spoiled my chances
8 of trying out for the team.

9 7. Fast forward to fall of my sophomore year. I finally moved onto campus and was
10 ready for my second fall semester. I emailed the track and field coaches again in hopes of being
11 given the chance to try out again.

12 8. The generous coaches at UMass Lowell gave me my chance and I wanted to make
13 sure they didn't regret it. The throws coach, Barbara Smith, saw I had some potential and allowed
14 me to continue through my sophomore year to see how I would do in a competition.

15 9. In my first competition, I threw a personal best of 178 feet while dealing with an
16 injury. Then, in my second competition, I broke the UMass Lowell school record with a throw
17 of 216 feet. I have competed at three consecutive NCAA regional competitions, achieved 1st
18 and 2nd place finishes at the America East Conference Championships, and achieved a 5th place
19 finish at the U.S Olympic Trials with a personal best throw at that competition of 248 feet.

20 10. Having grown up in the small town of Stoneham, Massachusetts, I did not have
21 many resources at my disposal from my high school such as funds, equipment, and coaching.
22 UMass Lowell provided me with the necessary resources to help unlock my potential and I will
23 be forever grateful for that.

24 11. These have been the best years of my life so far, and none of it would be possible
25 if they had not given me a chance to try out for the team. I object to roster limits because they
26 will prevent athletes like me from receiving opportunities to develop at the college level.

27 12. With limited roster spots, underdeveloped high-school athletes, like me, who do
28 not have access to the necessary resources will never be able to get their opportunity. I am lucky

1 to have been able to get my chance before the NCAA limits roster sizes, but I know future
2 athletes will not get the same chance, and others will have their dreams crushed as they will not
3 be able to show their true capabilities. I can't imagine what it would have felt like to train through
4 the adversities of Covid-19 and only to be denied a chance to try out for the team because the
5 roster was full.

6 13. Sports have always been about inclusion, and limited rosters will drive others
7 away from sports as they will feel they are not good enough.

8 I declare under penalty of perjury that the foregoing is true and correct.

9 Dated: Lowell, Massachusetts
10 January 15, 2025


James Kotowski

NCAA ECID No. 2109324650

[Mailing Address]

162 Riverside St. Apt 2
Lowell, MA 01854

Leo Kurucz
1004 SW Sunflower Drive
Lee's Summit, MO 64081

January 17, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Leo Kurucz. I am a current Division I athlete at the University of Missouri and my NCAA ECID number is 2110338799. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
/s/ Leo Kurucz

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF LEO KURUCZ

I, Leo Kurucz, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a sophomore at the University of Missouri, where I am a member of its Division I swim and dive team. I am a member of the Injunctive Relief Class and object individually and on behalf of the class.

2. I started swimming when I was seven and made many sacrifices over the following years so that I could become a competitive swimmer. At thirteen, I quit participating in other sports—football, basketball, and baseball—to focus on swimming. At one point, I switched teams and had to drive 45 minutes each way to practice, twice on many days. Through this focus I realized some successes. Junior year I won a state championship in the medley relay, and senior year I was the state champion in the 200-yard freestyle. I set multiple high-school and state records.

3. College coaches started recruiting the summer before my junior year. Over ten schools reached out to me about joining their programs. College coaches liked that I could swim any freestyle event, from the 50 to the mile. I ultimately committed to Mizzou. I was promised, for all four years, a partial athletic scholarship and partial academic scholarship, along with access to the athletic training center, athletic dining hall, mental performance coaching, free physical rehabilitation, and academic support. The deal was too good to pass up. Plus, I got to stay close to home.

4. I had a successful freshman year at Mizzou. But halfway through the season, I suffered a back injury that required surgery, which I underwent this January.

1 5. Last year, another teammate broke three ribs. My coach did not cut him. And
2 when he recovered, he qualified for the U.S. Olympic Trials. I am optimistic that, if I am allowed
3 to stay on the team, I will also recover and return to peak performance.

4 6. Early this past fall, the coaches told the team that eleven swimmers would be cut
5 from the men's side and three or four would be cut from the women's side.

6 7. Additionally, there are a lot of recruits coming and I know that some of them have
7 already been told that they may not have a spot even next year. I cannot imagine committing to
8 a school and then being told after the commitment that you don't have a spot. That's not fair to
9 them either.

10 8. It is highly likely that I will get cut from the team. I'm not for sure. The likelihood
11 of them keeping me on the team if I am injured is low. If there are no roster limits, however, I
12 know that my coaches will aid in my recovery process and give me the time I need to get back
13 into the sport. They are helpful right now and have been a huge support system for me. We just
14 don't know what the future holds, and that is tough to think about especially after a big surgery.
15 If the roster limits are not imposed, the coach has told us that all of us will have a place on the
16 team. He cares about us and does not want to make cuts to the team. But if the roster limits are
17 approved, he won't have a choice.

18 9. I want to keep swimming, so if I am cut, I would enter the transfer portal. But I
19 am scared that I will not know whether I am cut or not in time to enter the transfer portal this
20 year. Plus, the portal will be flooded with swimmers like me who are trying to find another
21 roster spot. I am also concerned that schools will be hesitant to give me a chance because of my
22 injury—that terrible timing makes the possibility of roster cuts even worse. They might want to
23 see my performance after a year of recovery if they are not sure that I will swim at the same level
24 as before my injury.

25 10. I do not want to be cut, nor do I want to transfer. I have become very close with
26 my teammates over the past two years. I love the team culture at Mizzou. I do not want to have
27 to choose between my friends and teammates and my dream of swimming in Division I.

28 11. Even though I have been injured, I am still very close with my teammates. I live

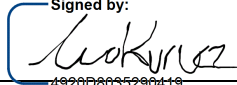
with my teammates on a cul-de-sac—and all my neighbors are also swim teammates and some track and field athletes. But the threat of roster cuts has all of us anxious and unsure about what happens next year.

12. If I have to transfer, I will lose my scholarships and potentially the opportunity to pay in-state tuition. I also might have to break my lease, which will have financial repercussions.

13. These roster limits serve no purpose and are causing student-athletes like me a lot of stress and anxiety. I cannot be the only injured player who is facing this situation. Without roster limits, injured players like me would be able to continue fighting for our dreams of playing college sports at the highest level.

I declare under penalty of perjury that the foregoing is true and correct.

Columbia, Missouri
January 17, 2025

Signed by:


Leo Kurucz
NCAA ECID No. 2110338799
1004 SW Sunflower Drive
Lee's Summit, MO 64081

Nick Laffey
11717 Morning Star Drive
Germantown, MD 20876

January 17, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Nick Laffey. I am a current Division I athlete at Loyola University – Maryland and my NCAA ECID number is 2208636047. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Nick Laffey

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

7
8 **DECLARATION OF NICK LAFFEY**

9 I, Nick Laffey, hereby declare as follows pursuant to 28 U.S.C. §1746:

10 1. I am a sophomore at Virginia Tech and was, until this winter, a member of the
11 Division I men's soccer team. I am a member of the Injunctive Relief Class and I object
12 individually and on behalf of the class.

13 2. I started playing soccer when I was three years old and fell in love with the
14 sport. I continued working on my game through high school, and my hard work paid off. I
15 was named the 2021 & 2022 D.C. Gatorade Player of the Year, the 2021 Washington Catholic
16 Athletic Conference Player of the Year, and was recognized in 2021 & 2022 as All-Met First
17 Team for the D.C. area.

18 3. Beginning in the summer before my junior year, I started to receive college
19 recruitment interest, including from multiple Division I programs. This included Virginia
20 Tech.

21 4. As part of the recruiting process, I visited Virginia Tech and immediately felt at
22 home on campus and with the team. After receiving a scholarship offer, I committed to the
23 program. I played on the soccer team during my freshman year and greatly enjoyed it. I got to
24 play the sport I love with great coaches, great teammates, and great facilities.

5. I was looking forward to my sophomore season when I arrived on campus this

1 past August. In September, though, I started hearing about the possibility of roster limits from
2 my teammates. I did not think much of it at the time because it sounded like only a small
3 chance.

4 6. This all changed on November 11, when my coach told me during a meeting
5 that I would be cut from the team, effective immediately. I would not be able to finish my
6 sophomore year on the team. My coach told me that roster limits were the reason he was
7 cutting me from the team. That same day, he cut other players from the team, too.

8 7. Playing college soccer has been my dream, and I was immediately determined
9 not to let it end so soon. After I heard that I was cut, I entered the transfer portal. This was a
10 hard decision for me, because my entire life is at Virginia Tech. My teammates are my best
11 friends, and Virginia Tech offers amazing benefits for its athletes. Transferring meant that I
12 would give all of this up just to keep playing soccer.

13 8. I feel lucky that I was able to get another roster spot and that I will continue my
14 soccer career at Loyola Maryland. But I will not get an athletic scholarship during the spring
15 to play at Loyola. And while I am excited to join Loyola's squad, the university does not offer
16 as many perks to its athletes. For example, it does not offer free weekday meals like Virginia
17 Tech does. My new coach has told me I should get an athletic scholarship down the line, but
18 nothing seems guaranteed.

19 9. Transferring is causing me to uproot my entire life to continue playing soccer.
20 When I started at Virginia Tech, I had no idea that this could happen. I believed I would play
21 as a Hokie for my entire college career.

22 10. I know that I am one of the "lucky" ones because I found a new roster spot. So
23 many athletes will not be this lucky and will have to prematurely retire from the sports they
24 love. This is not fair.

1 11. It hurts so much more because there is no reason for it. The NCAA does not
2 need to implement these roster limits. The roster system was not broken before. It does not
3 need fixing. The roster limits have negatively impacted me personally but will also negatively
4 impact hundreds of other college athletes. Roster limits have no place in this settlement.

5 I declare under penalty of perjury that the foregoing is true and correct.

6 Dated: Montgomery County, Maryland
7 January 17, 2025



Nick Laffey
NCAA ECID No. 2208636047
11717 Morning Star Drive
Germantown, MD 20876

Carly Lauritzen
4040 7th Ave NE
Seattle, WA 98105

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Carly Lauritzen. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 1909693548. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Carly Lauritzen

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF CARLY LAURITZEN**

9 I, Carly Lauritzen, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a senior at the University of Washington and am a member of the NCAA
11 Division I Women's Rowing team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 2. I have been an athlete my entire life. For ten years, I was a competitive gymnast,
14 dedicating myself to four-hour practices, six days a week. Being an athlete has always been a
15 fundamental part of who I am. When I reached high school, I retired from gymnastics and
16 became a pole vaulter—a new challenge that was both exciting and intimidating. I had never
17 participated in school sports before, as gymnastics had consumed all my extracurricular time.
18 However, once I committed to pole vaulting, it became my passion, and I ultimately became a
19 state champion. I had hoped to continue my athletic career at the University of Washington as a
20 track and field athlete, but due to the COVID-19 pandemic, athletic recruiting became difficult.
21 When I accepted my offer to attend UW, I had no assurance of a spot on the track team. Just
22 weeks before moving to campus, I received an email from the UW Women's Rowing Team,
23 inviting incoming female students to try out for their program as walk-ons. I thought my dreams
24 of competing as a Division I athlete were over, but this email gave me another chance. I had no
25 prior knowledge of rowing, yet I knew this opportunity was rare. The program welcomed me,
26 taught me the sport, and helped me develop a passion for something I had never imagined myself
27 competing in. Once I made the team, I began training alongside national champions, world
28 champions, and even Olympians. The learning curve was steep—rowing requires an immense

1 technical and physical foundation—but over the course of a year, I built the skill and fitness
2 necessary to compete at the varsity level. Our head coach, Yaz Farooq, recently gathered our
3 team to inform us of the potential roster caps. Our team is currently the largest it has ever been,
4 with 103 athletes. This depth is crucial to our development as a team and as individuals. In
5 rowing, novices need time to develop, and their progress in that first year is exponential. The
6 proposed roster cap would severely limit these opportunities, potentially eliminating future
7 Olympians before they even have a chance to grow into the sport. The roster cap would
8 fundamentally change the dynamic of our team and harm athletes at every level. Walk-ons, like
9 me, would not have enough time to develop before being evaluated for a permanent spot,
10 effectively ending their athletic careers before they begin. Fewer athletes would be recruited,
11 reducing the pipeline for future Olympic and national team rowers. Current varsity members
12 would face uncertainty about whether there is a place for them on the team. Injuries, a common
13 reality in rowing, could become career-ending, as athletes may hesitate to seek treatment for fear
14 of being cut. Personally, I suffered a season-ending back injury just over a year ago. Thanks to
15 the care and support of our incredible staff, I was able to recover fully and return to the sport this
16 season. Had a roster cap been in place, I likely wouldn't have had the chance to rehabilitate and
17 make a comeback. Worse, I might not have had access to the medical treatment I needed through
18 the athletic department. Athletes are already under immense stress balancing academics and
19 athletics. A roster cap would only worsen this burden by creating an environment of fear—fear
20 of getting cut, losing financial aid, access to tutors, medical care, housing, and so much more.
21 Many student-athletes, myself included, would face devastating consequences if we were
22 suddenly forced off our teams. Because of my injury, I have an extra year of eligibility to
23 compete. I had planned to extend my undergraduate degree at UW to continue rowing, accepting
24 the financial burden this extra year will have on me and my family in order to pursue the sport
25 that I love. However, if the roster cap forces me off the team, this investment—both financially
26 and emotionally—will have been for nothing. I would lose my chance to compete, my access to
27 crucial athletic and academic resources, and most heartbreakingly, my teammates, who have
28 become my family. I plead with the court not to impose these roster limits. This decision will

1 devastate thousands of student-athletes and severely restrict opportunities for so many who, like
2 me, came to their sport through unconventional paths. Rowing, and collegiate athletics, thrive
3 on depth, development, and opportunity. Please do not take that away from us.

4 I declare under penalty of perjury that the foregoing is true and correct.

5 Dated: Seattle, Washington

6 January 26, 2025



Carly Lauritzen
NCAA ECID No. 1909693548
4040 7th Ave NE
Seattle, WA 98105

Caroline Law
528 Briar Rd.
Bellingham, WA 98225

1/30/2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Caroline Law. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 2308985316. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Caroline Law

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF CAROLINE LAW**

9 I, Caroline Law, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a Freshman at the University of Washington, and I am a member of the
11 NCAA Division I women's rowing team. I am a member of the Injunctive Relief Settlement
12 Class and object both individually and on behalf of the class.

13 2. I came onto UW rowing team as a recruited walk-on after previously playing
14 soccer and a variety of other sports as a child. Although I didn't have any rowing experience
15 prior to college, my experiences with other types of competition prepared me to be a D1 athlete.
16 For almost half my life, I spent every weekend at soccer games, often having to drive several
17 hours to away games in Seattle or across the state. Summers were taken up by soccer tournaments
18 and summer nights were for soccer practices. My life revolved around sports, and I couldn't see
19 my life without it. For years I convinced myself that I loved soccer and that all the time and
20 resources My family and I were putting into it were worth it. I ignored the fact that I dreaded the
21 two-hour drive to Seattle every weekend and lacked the confidence to excel in the sport. I often
22 felt like a failure and wondered what was wrong with me. I did all the training and more needed
23 to be a decent soccer player, yet I simply wasn't clicking for me. I would do extra cardio, hours
24 of footwork in my garage, and watch soccer games every weekend. But it was never enough. I
25 lacked the confidence and mental strength required to be successful, and I hated myself for it. I
26 had all the physical capabilities I would need, yet my mind failed me time and time again. That
27 is until I found a niche sport called rowing.

28 3. My brother had just walked-on to the men rowing team, and my mom was

1 ushering me to try it out by filling out a questionnaire the women's team had on their social
2 media. I was hesitant at first because I had heard how challenging it was from my brother, but I
3 eventually caved because why not? So, I filled out the questionnaire and got a response within a
4 couple days saying I could come out to see a practice. A few weeks later, I was watching the
5 team from a safety launch, idolizing the rowers, not knowing one day I would be rowing right
6 next to them.

7 4. Although I didn't have any significant athletics achievements, the coaches were
8 eager to recruit me and were consistent with staying in contact with me and notifying me of
9 anything I needed to know. They invited me to events and practices, and when it was time to
10 sign the NLI, they immediately connected me to my future teammates and gave me the proper
11 resources to prepare for college athletics. Even though nothing about me was very 'standout',
12 except for my height, the coaches took a chance on me simply because they could. If the roster
13 limit wasn't the number that currently is, they wouldn't have taken a chance on me, and I
14 wouldn't be where I am today, a freshman walk-on that has exceeded varsity standard erg times
15 and has trained in varsity boats. I have found a deep love for this sport and confidence that I
16 haven't had with any other sport that I've played, finally proving myself wrong and that I'm
17 capable of showing my true potential and pushing back on mental barriers that I've struggled
18 with for so long.

19 5. I am forever grateful for the opportunities that have been given to me because of
20 this program, and it would not be possible without a big roster. I found my community, my
21 friends, and my support system through rowing, and I wouldn't be at the University of
22 Washington if it weren't for scholarships for local athletes, like the Hometown Husky
23 scholarship as well as the possibility of NCAA scholarships. The impact the team atmosphere
24 has on everyone's performance is enormous and having people you trust by your side at all times.
25 If there were large cuts to the team, my support system would be significantly reduced, along
26 with many other people, and it would impact performance both athletically and academically. It
27 would be a serious detriment to team moral and mental health, which would hurt our team's
28 performance. If close to 40% of the team in cut in the middle of the school year, I can only

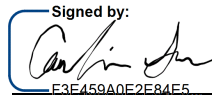
1 imagine the repercussions it would have on both the people being cut and people losing their
2 friends and teammates. Much of the joy I have from this sport is seeing my friends and my
3 teammates at practice every day, and if that were to be ripped from me with one fell swoop, it
4 would completely change the team environment and will have lasting consequences.

5 6. It's vital that the roster limit isn't cut down to only 68 spots, because it wouldn't
6 give developing athletes like myself the chance to discover their true potential It would disrupt
7 the team dynamic and environment, with people losing their support systems in the middle of
8 the school year, making them question their ability to compete as such a high level, further
9 impacting the stability of the team. As a walk-on, I wouldn't have this opportunity without big
10 roster limits, and I wouldn't be able to contribute to the team as I have this season and continue
11 the amazing walk-on legacy at the University of Washington.

12 I declare under penalty of perjury that the foregoing is true and correct.

13 Dated: Seattle, WA

14 January 30, 2025

Signed by:

E3E459A0E2E84E5

Caroline Law
NCAA ECID No. 2308985316
528 Brair Rd
Bellingham, WA 98225

Isaac Lee
122 Princeton Lane
Tullahoma, TN 37388

January 22, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Isaac Lee. I am a current Division I athlete at Auburn University and my NCAA ECID number is 2204525161. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Isaac Lee

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

7
8 DECLARATION OF ISAAC LEE

I, Isaac Lee, hereby declare as follows pursuant to 28 U.S.C. § 1746:

9 1. I am freshman at Auburn University and a member of its NCAA Division I men's
10 swim team. I am a member of the Injunctive Relief Settlement Class and object both individually
11 and on behalf of the class.

12 2. I have been swimming since I was five years old, and I dreamed of having the
13 chance to swim at the Division I level for as long as I can remember. I was so excited when
14 Auburn University gave me the opportunity to swim for their team. It is a true privilege to swim
15 for Auburn and their coaching staff.

16 3. The proposed roster limits in the *House v. NCAA* Settlement are unfair for student
17 athletes that are currently participating in college sports like me. It is also unfair to their coaches.
18 My coaches as well as other college coaches have spent hours of their personal time recruiting
19 swimmers, developing those swimmers, and cultivating the team's relationships. These roster
20 limits will effectively destroy the current teams that they have brought together.

21 4. In addition, freshman swimmers like myself will never be given the opportunity
22 to grow and develop as swimmers. Most freshman athletes need to be given the chance to adapt
23 to the rigorous training Division I sports require.

24 5. Auburn University gave me a 4-year athletic scholarship, and I hope that will be
25 honored if I am cut. However, my parents would be responsible for an additional \$30,000 per
26 year to cover the almost \$60,000 price tag to attend Auburn as an out-of-state student if I was
27 dropped from the team. I would lose free dining, free healthcare, free tutoring, and summer
28

1 stipends, just to name a few.

2 6. I would no longer be able to stay at Auburn with these additional costs. Since I
3 had a four-year contract, I never dreamed that I could potentially lose my position on the team
4 before I graduate. I have also signed a leasing agreement for housing next year and my parents
5 are co-signers.

6 7. I have dedicated most of my life to this sport and I deserve the chance to become
7 the swimmer that I know I can become. I want to do this at Auburn because I want the honor of
8 graduating from the University I believe in.

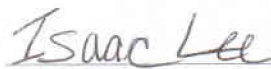
9 8. In addition, it is too late for swimmers to enter the portal and find another school.
10 For most of us, it is cost prohibitive to remain at the university without the financial benefits of
11 being an athlete.

12 9. Please consider the thousands of us that will be in the same position across the
13 nation and at least allow us to be "grandfathered in" since we made decisions for our future based
14 on information and promises that we thought were immutable. Please consider the thousands of
15 hopeful high school athletes as well. Their opportunities to swim or compete in other sports at
16 the collegiate level are deteriorating due to the imposed limits. Please consider the coaches that
17 have devoted their lives to the development of the sport and their teams.

18 10. Please reject the roster limits.

19 I declare under penalty of perjury that the foregoing is true and correct.

20 Dated: Tullahoma, TN
21 January 22, 2025



Isaac Lee
NCAA ECID No. 2204525161
122 Princeton Lane,
Tullahoma, TN 37388

Megan Lee
9201 Interlake Ave. N
Seattle, WA 98105

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Megan Lee. I am a current Division I athlete at University of Washington and my NCAA ECID number is 1711967922. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Megan Lee

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION
6

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

7
8 **DECLARATION OF MEGAN LEE**

9 I, Megan Lee, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a graduate student at the University of Washington and am a member of the
11 NCAA Division I Women's Rowing team. I am a member of the Injunctive Relief Settlement
12 Class and object both individually and on behalf of the class.

13 2. Being a Division I Athlete has been one of the greatest privileges of my life. The
14 idea of being recruited to row in college pushed me to be a better student in highschool because
15 it pushed me to get my grades up in order for the coaches to recruit me. In turn, this motivation
16 in school has set me up for future success. The desire to become a Division 1 Athlete took
17 sacrifice. Every summer I moved away to a different state to pursue the Junior National team
18 with the hopes it would help my chances of being recruited to a top university. I missed family
19 gatherings, vacations, and most of all, I missed out on working a job to earn money. The pursuit
20 of rowing in college has left me with less money than those of my friends who were able to work
21 all summer. However, every single sacrifice was worth it because I got the opportunity to be on
22 a Division 1 rowing team where I learned more life skills than any class could ever teach me.

23 3. The recruiting process was very exciting for me. It felt that all of my hard work
24 in high school was paying off. I had coaches reaching out to me through email, I was on phone
25 calls with coaches, and I visited numerous campuses to see which school felt right for me. During
26 my process I learned about how I could have the best of both worlds; pursue my sport at a very
27 high level while gaining an amazing education. I was urged by many people in my life that I
28 needed to choose a school that was right for me in both an athletic and academic sense. After my

1 visit, I immediately knew where I wanted to spend the next four years. I chose Duke University
2 as my undergraduate school to commit to. Nothing could sway me from the desire to attend
3 Duke. I worked harder than I ever had to ensure the coaches would offer me a spot. I hung Duke
4 posters all around my room, I thought about Duke during every hard workout, and I began
5 dreaming of my life as a Duke Student-athlete. It paid off; a few months later, the coaches offered
6 me a spot in their freshman recruiting class with a 25% scholarship. They told me I was
7 committed to their school and would only be cut if I did not keep my GPA up through the rest
8 of high school or if I had any disciplinary action. I could finally take a deep breath knowing that
9 my future was secure. My hard work had paid off and now I could focus on improving myself
10 as an athlete instead of stressing about my spot on the team. This is a luxury that student athletes
11 will not have anymore with the creation of the roster caps. My recruiting process for my graduate
12 year proves even further the detriment of a roster cap. I developed a lot through my time at Duke,
13 and am progressing through the National team with the hopes of making the 2028 Olympic team.
14 I had one more year of eligibility and wanted to further my education while rowing at the
15 University of Washington which is the best of the best. I made a last minute decision in July, to
16 come to UW for the upcoming school year and it has been one of the best decisions I've made.
17 This would not have been possible for me if there were a roster cap because the coaches would
18 not have been able to add a last minute addition so late in the summer. This roster cap would
19 have stunted my development and denied me another year of education to better myself for life
20 after sport.

21 4. Roster limits have been a looming stress for the past few months. Last week we
22 had a meeting with our coach where she outlined the process that the team will follow in order
23 to decrease our team to fit within the limits. The obvious effect is that many of our current
24 teammates will not continue on our team. However, an unseen effect is that the team will not get
25 to race in the fall. Teams must be at 68 members by December 1st or by their first competition.
26 Our team needs as much time as possible to decide who will be included in the 68 athletes so we
27 will not be finalizing the roster until December 1st. This ruling takes away what we all love so
28 much about our sport- both racing and our teammates

1 5. Rowing is all about long term development. A female rower does not reach her
2 peak until 28 years old. This is very different than other sports where in high school, an athlete
3 has almost reached their potential. These roster cuts are forcing rowers to focus on short term
4 success, instead of long term development. The walk on program at universities is a strong
5 pipeline to the USRowing National Team. There have been numerous Olympians that walked
6 onto their collegiate rowing team and are now Olympic medalists. This ruling not only affects
7 students at the collegiate level, but it also impacts the future success of the United States Olympic
8 team.

9 6. Since I am a graduate student, these cuts will not personally affect me. However,
10 if these cuts had been in place during my undergraduate education, my college experience would
11 have been very different. My best friend, Charlotte, was a walk-on with no rowing experience.
12 With the roster cap, she would not have been on the team, and our team would have significantly
13 suffered because of it. Charlotte was the heart and soul of our team. She boosted everyone's
14 mood, built bonds between the classes, aided the captains in logistical decisions, and rowed her
15 way to a silver medal at the ACC championships. At times, without her, my performance in a
16 top boat would have been worse and I would not have loved my university as much as I did. I
17 use this example to prove that even people not competing at the top of the team play a significant
18 role in the success of the team and taking these people away would change the entire team's
19 trajectory.

20 7. The NCAA states "Grow the college sports ecosystem" as one of their missions
21 and priorities. This roster limit is in direct opposition to the NCAA's mission and priority. Please
22 consider revoking the roster limits in order to allow full development of student-athletes as
23 students, athletes, and well rounded people.

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1 I declare under penalty of perjury that the foregoing is true and correct.
2

3
4 Dated: Seattle/King County, WA
5 January 26, 2025



Megan Lee
NCAA ECID No. 1711967922
9201 Interlake Ave N.
Seattle, WA 93105

Alana Lei Lin Uehara
McCarty Hall, Room #748
4330 Little Canoe Channel NE* Seattle, WA 98195

1.27.25

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Alana Lei Lin Uehara. I am a current Division I athlete at the University of Washington, Seattle and my NCAA ECID number is 2207615078. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Alana Lei Lin Uehara

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF ALANA LEI LIN UEHARA

I, Alana Lei Lin Uehara, hereby declare as follows pursuant to 28 U.S.C. §1746:

1. I am a freshman at the University of Washington, Seattle and am a member of the NCAA Division I Women's Rowing team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. I am from O'ahu, Hawai'i where there is only one youth team and one boat in the entire state. I worked for almost 3 years, 5 days a week and 1.5-2 hours a day at 5:15 AM before school, the only time our coach could be there before her day job started chasing the dream I had of becoming a collegiate athlete at the University of Washington. My parents and family sacrificed so much for me to be able to attend camps to learn more about rowing and to have the best chance I could since there is little to no rowing where I am from. I attended an online school so that I could focus on pursuing my passion and missed out on many high school experiences such as proms, parties, and football games/rallies so that I could put myself in the best position to have the opportunity for recruitment at my dream school. These are all experiences that I truly would never have changed or went back on.

3. Due to the sport and the opportunities that my teams' hard work got us to, we were able to race in the first 2,000m race that any team from Hawai'i had raced in 50 years at the San Diego Crew Classic. We raced in an 8+ although we only had a 4+ to prepare with

1 throughout our months of training and only 3 of the athletes (including me) had ever been in an
2 8+ before the race weekend. This was my very first race and an extremely huge growth
3 experience for me. I am a coxswain and was able to get my first race recording here to continue
4 reaching out to coaches to really have more of a chance at achieving my dream of participating
5 in collegiate athletics. I worked to prepare for this race for months, reaching out to coxswains
6 and rowers who had completed the course to get perspective and insights on how best to
7 prepare my crew.

8 4. My recruiting experience was truly a blessing and a journey I searched for a
9 team that allowed me an equal opportunity to be selected, with a truly incredible team culture
10 where I could grow the most. I chose the University of Washington because it promised me all
11 of the above. I turned down other opportunities including those that promised me scholarships
12 because I know that Washington helps to develop world class athletes with the foundation
13 being individuals who maybe never would have found the sport if not given the opportunity.
14 Washington is everything I could have hoped for and more but now hearing about the drastic
15 roster limits is truly and absolutely devastating.

16 5. I learned about roster limits through a team meeting and from talk of other
17 athletes and news after the limits were introduced. I know that many teams and athletes have
18 already been cut in anticipation for these huge changes. There have been an incredible amount
19 of athletes affected. I know that my team has always had a larger incoming class because it
20 helps us to set the stage for an incredible year with many more opportunities for growth for
21 coxswains and rowers alike. We are privileged to have these numbers and they help to make
22 our team who we are with the diversity in backgrounds, experiences, and expertise. I know that
23 if the roster limits are passed, many athletes will never be able to live up to their full potential
24 or even have the chance to. Dreams will be cut off at the very base and years of sweat, tears,

1 sacrifices, and work will all be in vain if these cuts pass.

2 6. These cuts are absolutely taking a huge mental toll on all of my teammates.
3 Individually, I know all of the freshmen coming already have something to prove, but the idea
4 of these cuts only creates discouragement, fear, and dread at the thought of making mistakes or
5 underperforming. There is an insane amount of psychological and physical pressure within the
6 sport of rowing and in addition to the 20 hour weeks we have just transitioned to, drastic cuts
7 for our team to reach the extremely lowered number of spots will be devastating for the team
8 dynamic and psyche. I have talked to some of the athletes and the situation really feels
9 hopeless and it feels like our work will have been in vain.

10 7. If I am cut, I stand to lose almost everything. I am a student athlete with
11 learning differences, my family requires financial support and my parents have put in a loan to
12 be able to even send me here to be able to follow my dreams of collegiate athletics. If I am cut,
13 I will lose the academic support that I have truly thrived with, the meal plan and benefits of
14 food and nutrition from the team, the psychological support and counseling that I have
15 benefitted so much from, and the identity and purpose that I have revolved around for the past
16 4 years of my life. I have made lifelong best friends through this sport. I have met people that I
17 will want to know for the rest of my life. Not to mention the support from the school for
18 student athletes and the emotional and mental support that we have the privilege of receiving,
19 but also my family will have sacrificed so much and it will all feel almost as if it were for
20 naught.

21 8. Due to roster limits, I am having to consider what other opportunities will be
22 available for me and may have to transfer or even go back home. I don't know if I could
23 imagine not competing or not being surrounded by the powerful individuals that make up my
24 team and push me to be better every single day. For the position of a coxswain, there are

1 extremely limited opportunities especially at places that truly care about the growth and
2 holistic wellbeing of their coxswains such as University of Washington, where I am now. I will
3 not only have to leave behind the support, growth, and progress that I have made here, but I
4 will also have to try and find somewhere else that I can truly feel at home at.

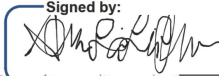
5 9. I beg that the court please consider our desperate pleas to not pass the roster
6 limit. Many of us have worked for this dream to become collegiate athletes for our entire lives
7 and our goals and futures revolve around this chance that our families have sacrificed so much
8 time, energy and resources to support us in pursuing. Sports at the college level are already
9 very competitive, which is the nature of it all, but adding in roster limits will limit both our
10 opportunities as athletes but also our chances as women to have equal opportunities as male
11 athletes. As an Asian American and Pacific Islander woman, I have worked countless hours to
12 have the chances that my counterparts do both in sport and in life. I truly believe that the roster
13 limits would only hurt our teams, athletes, and people. Please do not take away our chances at
14 finding our true potential and seeing how great we could really be. I prayed and worked for
15 these opportunities every day as did my teammates and as did all of the athletes that these
16 limits will be impacting.

17 10. Please don't take away our dreams to put these roster limits into place. Please
18 don't throw away the years of sacrifices both us and our families made to have these
19 opportunities over one decision.
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I declare under penalty of perjury that the foregoing is true and correct.

Dated: Seattle, King County,
Washington

January 27, 2025

Signed by:


Alana Lei Lin Uehara
NCAA ECID No. 2207615078
McCarty Hall, Room #748
4330 Little Canoe Channel NE*
Seattle, WA 98195

Macy Lewis
1901 Mission Hill Cir
Edmond, OK 73025

1/30/2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Macy Lewis. I am a current Division I athlete at Texas A&M and my NCAA ECID number is 2109321092. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Macy Lewis

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF MACY LEWIS**

9 I, Macy Lewis, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman at Texas A&M University and a member of the NCAA Division
11 I women's swim team. I am a member of the Injunctive Relief Settlement Class and object both
12 individually and on behalf of the class.

13 2. To get to this level, I practiced year round since I was 7 years old. As I got older,
14 I practiced 7-8 practices a week, which totaled 12 hours a week. I gave up most other activities
15 because of my commitment to swimming. I travelled and missed school dances, parties, didn't
16 join other social clubs because I was so busy with swimming practice. My family scheduled our
17 vacations around my swim schedule to help me achieve this goal.

18 3. I made Sectionals national cuts at 13 years old, and then Futures time cuts at 14.
19 I made Junior National times by my sophomore year in high school, all while also getting a 3.67
20 GPA at a college prep high school. I was the State Champion for three years in high school on
21 my two individual events, and runner up on the two individual events the other year. I led my
22 Relays to victory against the team that won state two years in a row.

23 4. I chose Texas A&M University because it has a great swim program, and the
24 coach offered to develop me to be even better. A&M has excellent academics, so this was a
25 school I could also get a degree from for my future career. The team atmosphere was great and
26 the swimmers all seemed to get along. My mom went to A&M, too, so that made it even more
27 special for me to go to the same school!

28 5. The school spirit is amazing and no other school can match it. The swimmers

1 there stayed all four years which showed me it was a good program. It is also only 6.5 hours
2 from home, which was important to me because I didn't want to go too far away. I turned down
3 other offers to go to Texas A&M, and do not want to have to pick between not swimming or
4 transferring to another school.

5 6. The coaches haven't talked about it, but I found out from social media and the
6 website SwimSwam. It gave me a lot of anxiety and trepidation starting college. I was I leaving
7 home for the first time and having to practice 20-25 hours a week for swimming, but now, I feel
8 the pressure that if I don't perform I can be cut. The coach that recruited me left the school, too,
9 so the new coaches did not know me. They may just go to the portal. Honestly, our team is
10 suffering from the stress of this and some people are not doing as well because of it.

11 7. My first semester was really hard to adjust. I cried a lot and had anxiety, as did
12 my teammates. Most of us had to go see the sports psychologist at least once. Swim is also
13 combined with dive in the roster limits, so no one knows how many divers will be kept. This
14 just adds another layer of uncertainty.

15 8. My parents already had to sign a lease in the fall, which is common for big
16 schools. So if I get cut, I have to sub-lease my apartment if I want to swim somewhere else. A
17 lot of people on the team are depressed, and several have left practice crying. It is hard to enjoy
18 swim with this kind of pressure.

19 9. I also want to do well in school so it means I don't have much free time to enjoy
20 college and get to know more people. I also think it has affected my performance because it has
21 caused me to second guess my abilities. I also found out the new coach had cut 12 girls last year
22 to get ready for the settlement roster limits, but she did it after the portal closed for those
23 swimmers. So that is also stressful to know that could happen to me.

24 10. If I am cut I will lose my meal plan, which is equivalent to \$9,000, my sport I
25 love, my friends, tutoring, academic counselling, eating at special dining hall with teammates,
26 and my identity and purpose as an athlete.

27 11. One of my biggest worries is that, if I have to sublet my apartment because I need
28 to transfer to swim somewhere else, this will be an added expense on my parents. I haven't had

1 time to join other organizations because of swim, so if I am cut from the team I will have to start
2 over with friends, even if I stay and A&M.

3 12. The choices I am facing is to transfer to another school to swim, or stay and don't
4 swim and socially starting all over again at my school. It is stressful because I just went through
5 this adjustment as a freshman in college, and really don't want to have to do this again. If I
6 transfer I may also lose college credits and add another year onto college. My teammates could
7 lose two or more years of college credits if they are older.

8 13. This is not a fair choice to make. Swimmers don't get full rides so none of us
9 swim to get rich. It is just nice to get some school paid for to take the burden off my parents.
10 After all the work I and other athletes have put in for years, it is really disheartening that this is
11 all happening.

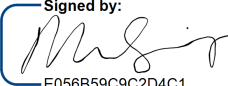
12 14. Please do not have the schools put roster limits in place for any sport in college.
13 The U.S. Olympic team will also be greatly affected as most Olympians come from college
14 teams in the US. With a generation that already struggles with anxiety, the roster limits are
15 creating hardships on athletes that we don't need.

16 15. College is also so expensive. Making athletes choose between their sport and
17 adding more years to earn our degrees creates unnecessary hardships on the athletes and our
18 families. Please stop the roster limits.

19 I declare under penalty of perjury that the foregoing is true and correct.

20 Dated: College Station, TX

21 January 30, 2025

Signed by:

E056B59C9C2D4C1...

22 Macy Lewis
23 NCAA ECID No. 2109321092
24 1901 Mission Hill Cir
25 Edmond, OK 73025
26
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Kyley Lloyd
111 Monument View Lane
Cary, NC 27519

January 21, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Kyley Lloyd. I am a current high school student at Green Hope High School and a swimmer. My NCAA ECID number is 2312186494. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Kyley Lloyd

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF KYLEY LLOYD**

9 I, Kyley Lloyd, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a 17-year-old high school junior and swimmer, and I hope to be recruited to
11 compete on a Division I college team. My older brother is Landon Lloyd, who is a freshman
12 swimmer at Auburn University. I am a member of the Injunctive Relief Settlement Class and
13 object both individually and on behalf of the class.

14 2. I have been swimming competitively since I was 5 years old. Like my brother
15 did, I swim with the Triangle Aquatic Center Titans and my high school, Green Hope High
16 School. And, just like him, I have also been working hard to be good enough to swim on a
17 Division I college program.

18 3. My brother and I faced significant challenges growing up. Our Dad had ALS.
19 Our family was always emotionally and financially stressed as a result. My Mom worked hard
20 to support me and my brother in our dreams to swim for a Division 1 college, while also taking
21 care of my dad. Because of this, my brother and I both knew we had to get financial aid to be
22 able to support ourselves in college.

23 4. I have been practicing in the water 6 days a week, for at least 2.5 hours a day. I
24 also have dryland training 3 days a week, lasting an hour. On some days we have two practices
25 a day. I've had to sacrifice many life events like birthday parties, family trips, school functions,
26 to accommodate my practice schedule.

27 5. My hard work paid off in high school. In my freshman and sophomore year, I
28 helped my high school team make it as conference and regional champions. At the North

1 Carolina high school state competition last year, I also helped lead my team to a second place
2 finish and claimed my first state championship title in the women's 4x50-meter free relay. I am
3 also an All-American athlete.

4 6. I learned about the roster limits proposed in the *House v. NCAA* settlement from
5 my brother. He is very smart (he has a 4.0 GPA in engineering), but he is very concerned about
6 being cut from his team even though he signed a 4-year contract. The extra stress he and my
7 Mom are enduring because they don't know if he will be able to continue at Auburn has been
8 terrible. By the time he finds out whether he has a roster spot, he will have missed the deadlines
9 to apply to an in-state university. My Mom is also stressed because he already signed a lease for
10 the following semester, and it would cost our family a lot to break it.

11 7. I am worried for him – and for myself. The roster limits will limit my own
12 chances of competing at the next level when I graduate from high school in 2026. Being able to
13 earn a place on a college swim team would greatly help me pay for my college education, in
14 addition to giving me the structure and focus I have worked so hard to obtain to get to the next
15 level of swimming. But due to the roster limits, I am afraid that dream is now out of reach.

16 8. I have personally experienced the effects of the roster limits on high schoolers
17 like me. My own recruiting process was interrupted last year because I suffered a major knee
18 injury in November, which led me to have surgery in late December 2024. I had been talking to
19 about 25 schools before my injury, but since then, I have not been able to focus on recruiting. I
20 am concerned that when I am healed, there will be no spot for me because the roster limits are
21 causing schools to make fewer offers.

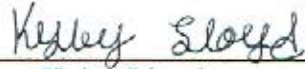
22 9. I want to swim in college so badly. Swimming is part of who I am, and it helped
23 me take care of myself while my Dad was sick. I don't know what I'll do if all of that is cut
24 short because the roster limits mean there is no space for me in any competitive college swim
25 roster.

26 10. It is not fair to implement the roster limits so suddenly and without warning.
27 Athletes who have worked so hard to earn a place on a college swim should not have the results
28 of their hard work and success yanked out from under them.

1 Athletes who have worked so hard to earn a place on a college swim should not have the
2 results of their hard work and success yanked out from under them.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Dated: Cary, North Carolina
5 January 21, 2025



Kiley Lloyd
NCAA ECID No. 2312186494
111 Monument View Lane
Cary, NC 27519

Landon Lloyd
111 Monument View Lane
Cary, NC 27519

January 25, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Landon Lloyd. I am a freshman NCAA Division I athlete at Auburn University, and my NCAA ECID number is 2204498641. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Landon Lloyd

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF LANDON LLOYD

I, Landon Lloyd, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a freshman at Auburn University, where I swim for the men's Division I swimming and diving team. I am a member of the Injunctive Relief Settlement Class and object to roster limits individually and on behalf of the class.

2. I have been swimming competitively since I was 7 years old. While in high school, I competed with the Triangle Aquatic Center Titans. Since I was 12 years old, I knew I wanted nothing more than to swim on a Division I college program.

3. I faced many challenges in my life to get to Division I. Growing up, training was difficult because my father suffered from ALS. It was tough on all of us, and we did everything we could as a family to care for him. On top of that, his medical bills were extremely high. My family experienced financial instability for most of my life as a result.

4. I wanted to swim in college so badly, but paying out of pocket for school would be brutal on my mother, who struggled every day to provide for me and my sister while caring for our father. Simply knowing about the debt I'd have to take on just to attend college was a huge source of stress in my life. To relieve the financial burden on my family, it was important that I earn an athletic scholarship.

5. So, I worked very, very hard to get great at swimming. I was a North Carolina 4A High School State finalist in the 100-meter freestyle. I was also a USA Swimming Futures Championship qualifier in the freestyle, backstroke, butterfly, and individual medley events. I

1 spent years developing in my sport and made countless sacrifices along the way to reach the
2 performance standards needed to earn a Division I swim scholarship.

3 6. When recruiting started, over 30 schools contacted me through text, emails, and
4 phone calls. I also reached out to a few schools through text and phone calls of my own
5 accord. The schools that showed the most interest, and which I considered most seriously,
6 were the University of North Carolina, Auburn, and Virginia Tech. I received two offers of
7 financial aid. Virginia Tech offered me a 15% cost of attendance coverage for 3 years, while
8 Auburn offered me a scholarship for approximately \$24,000, including an *Alston* award that
9 covered housing and food, and extra for expenses.

10 7. The scholarship offered by Auburn was offered in a four-year National Letter of
11 Intent – a contract – that I later signed. Due to my financial circumstances, there was no
12 question that Auburn's offer was more competitive. I also *liked* Auburn. While I compared
13 the cost of attending many more schools, Auburn and Virginia Tech were my favorites
14 regardless of the financial incentives they offered me. I ultimately chose Auburn because of
15 the financial aid *and* because of the wonderful engineering campus, student facilities, and the
16 campus environment. I loved Auburn's culture and how the school presented itself as a small
17 yet exciting town.

18 8. Earning a spot on Auburn's roster was a significant milestone in my swimming
19 career and a tremendous relief for my family. It brought my mother peace of mind knowing I
20 could look forward to a stable college environment in which to swim, compete, and grow.
21 And, my athletic scholarships offered us a financial lifeline.

22 9. I was so excited to start my freshman year at Auburn. I arrived on campus full
23 of hope. I was aware, however, that something ominous was going on. I originally learned
24 about the proposed roster limits in the *House v. NCAA* settlement over the summer through
25 social and online media. I had talked about the settlement with fellow club and future
26 teammates over the summer, but it hadn't yet occurred to me that I would be personally
27 impacted.
28

1 10. Then, when I began my first season in Fall 2024, my coach mentioned that
2 roster cuts were possibly on the horizon and that there was a lot of uncertainty about what the
3 Southeastern Conference's (SEC) and NCAA's roster policies would be because of the
4 settlement. Other than that, neither the coaching staff nor the school gave us details about the
5 roster limits. Everything else I learned about the roster limits impacting my team came from
6 online sources or word of mouth speculation by teammates and friends. I never asked our
7 coaches about what would happen to my athletic scholarships, because they hinted that if I
8 were cut, I would lose my position on the team *and* my scholarships.

9 11. The silence from the school has only increased the fear and distress on my team.
10 Many of the freshman in my class are worried about roster cuts, especially those who are not as
11 fast or developed as other teammates, and we worry for each other. My teammates and I love
12 Auburn and the people we train with, so getting the news that everything could be taken away
13 from us so quickly was shocking and disheartening.

14 12. I am also worried. I know a lot of my freshman teammates will enter the
15 transfer portal, but because it is already overwhelmed with people – and likely to be even more
16 overwhelmed if the roster limits are approved – the chances of finding another team are low. I
17 am afraid that my teammates' swimming careers will be cut short for no reason.

18 13. Even setting aside how oversaturated the transfer portal is, transferring is
19 personally unrealistic. I love my school and engineering program too much to leave. Going to
20 another school could require me to choose another degree or lose opportunities I have been
21 granted at Auburn. I could be stuck in the transfer portal instead of advancing the degree I
22 started here, which could delay my graduation and set me back a year. I am concerned that
23 many of my class credits will not transfer if I have to go to another school.

24 14. If I'm cut, I'll also have to eat the cost of the housing lease I'd already entered
25 for next semester. Even without the financial cost, my plans at Auburn are already threatened
26 by the roster limits. I am living with 3 other athletes whose futures are also jeopardized by the
27 roster cuts, and who might have to transfer because of them. The idea that I would be forced
28

1 apart from my friends and roommates after just one year at school for no good reason is
2 upsetting.

3 15. I am extremely distressed at the prospect of getting cut and losing everything I
4 worked so hard to achieve. My family and I relied on promises from Auburn that it is now
5 breaking. Not only do I face the possibility of losing my scholarships, but I would also have to
6 break financial commitments that my mother and I made in reliance on me finishing out my
7 athletic and academic career at Auburn, like my housing lease and class fees for the upcoming
8 terms. I have no way to plan out my future in the short or long term because everything is up
9 in the air. If I am cut or forced to transfer, I'd have to settle those obligations with little notice
10 or planning. The financial stability I fought so hard for is being threatened.


11 16. My teammates and I, who have grown and flourished together, also face
12 immense uncertainty about our futures. We are pitted against each other. I made fast friends
13 on the swim team, and we are being torn apart for no reason.

14 17. The roster limits will cause irreparable damage for many college student-
15 athletes. College athletics represents more than just playing a sport—it represents an avenue
16 for affordable higher-level education, and an unparalleled environment for personal
17 development, all while letting students do what they love.

18 18. Ripping everything I worked so hard to achieve away from me now is cruel and
19 unfair. Roster limits should not be approved.

20 I declare under penalty of perjury that the foregoing is true and correct.

21 Dated: Cary, North Carolina
22 January 15, 2025

23 
24 Landon Lloyd
25 NCAA ECID No. 2204498641
26 111 Monument View Lane
27 Cary, NC 27519
28

Benjamin Long
12130 Thornhill Court
Lakewood Ranch, FL 34202

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Benjamin Long. I am a current Division I athlete at the University of Kansas and my NCAA ECID number is 2110348694. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Benjamin Long

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF BENJAMIN LONG

I, Benjamin Long, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a sophomore on the golf team at the University of Kansas. I am a member of the Injunctive Relief Settlement Class and object individually and on behalf of the class.

2. I began playing golf at the age of six in my home country of Canada. I spent the first part of my life in Toronto, but my brother and I became passionate about golf. My family made a lot of sacrifices by moving us to Florida so that I could play golf. My father commuted from Toronto to Florida every few weeks, and my mom gave up her career.

3. In Florida, I played on my high school team at Saint Stephen's Episcopal School, where I helped the team win the state championship during my junior year. Even before I won a state championship, college coaches had begun reaching out to me about playing on their teams. I talked to over 20 schools before narrowing my search to three. One even offered me nearly a full-ride scholarship to play on their squad.

4. I ultimately chose Kansas because I liked the team and the facilities. Further, Kansas's team is very competitive, and it seemed like a great place to improve my game. I signed a four-year letter of intent and was offered an athletic scholarship that covers a significant portion of my tuition. Additionally, as an athlete at Kansas, I get other benefits like academic counseling, tutoring, free gym use, physical therapy,

1 access to the indoor and outdoor golf facilities, medical and dental insurance, and all
2 my meals covered.

3 5. I originally heard about the proposed roster limits during the summer from my
4 teammates, but heard nothing from the school. Then, in mid-November, my coach sent
5 an email saying that our roster had to be cut down to nine. This meant three guys
6 would be cut from the team.

7 6. At the end of November, my coach called me in for a meeting. He told me he
8 was cutting me from the golf team because of the roster limits.

9 7. Hearing this news was incredibly difficult. I redshirted my freshman year
10 because the coach told me he wanted me to play five—not one-and-a-half—years at
11 Kansas. And about six months ago, I suffered an injury and haven't been able to
12 compete for Kansas this year.

13 8. Playing golf at the highest level has always been my dream. I entered the
14 transfer portal immediately upon learning that I would be cut from the team. But
15 transferring would mean that I have to forfeit my amazing relationships with my
16 current teammates. And I do not know that I will get the same scholarship at another
17 school. It seems likely that anywhere I transfer will cost significantly more than
18 Kansas. It is also possible that I will not find a spot on another Division I team.

19 9. Another reason I chose Kansas was because of its undergraduate Business
20 major, which is a program that not all universities offer to undergraduates. If I transfer
21 to continue playing golf, I may have to change my major.

22 10. This has all been very stressful, because in addition to the possibility of losing
23 the ability to play my sport, I may also have to say goodbye to the people I've built
24 relationships with.

25 11. I know I haven't hit my ceiling in golf yet. Golf is a sport where many players
26 don't hit their peak until their thirties. Cutting golfers during their early developmental
years means cutting golfers who could in a few years be some of the very best in the

1 world. This cuts off a key development pipeline for professional players. Roster limits
2 simply do not make sense in this context.

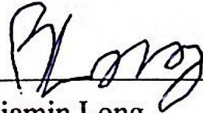
3 12. Roster limits also greatly impact the ability of a player to recover from an injury
4 as a redshirt. This is especially true if a player needs additional time to recover. The
5 pressure to keep a roster spot may encourage athletes to return to play before their
6 injury is fully healed—and this can lead to even greater, potentially career-ending
7 injuries. No one should feel like they have to play through an injury just to stay on the
8 team.

9 13. Most of my life has been dedicated to golf, and now my entire future is being
10 jeopardized. I must choose between golf and my school and friendships. The
11 possibility of roster limits has contradicted what athletes like me were promised when
12 we committed to our schools. We signed on to play for four years and to have the
13 opportunities to develop through hard work, and now our time may be cut short.

14 14. These roster limits are destructive. Please do not approve them.

15 I declare under penalty of perjury that the foregoing is true and correct.

16 Dated: Lawrence, Kansas
17 January 26 2025


Benjamin Long
NCAA ECID No. 2110348694
12130 Thornhill Court
Lakewood Ranch, FL 34202

Kathryn Long
157 Rudder Court
Lexington, SC 29072

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Kathryn Long. I am a current Division I athlete at Auburn University and my NCAA ECID number is 2210690193. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Kathryn Long

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF KATHRYN LONG**

9 I, Kathryn Long, hereby declare as follows, pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman at Auburn University. I am a member of the NCAA Division I
11 swimming and diving team and thus a member of the Injunctive Relief Class. I am writing to
12 oppose the roster limits, and my objection applies to that class.

13 2. Diving has been central to my life since I was in kindergarten, and it's the reason
14 I came to Auburn. When I committed, I was promised a spot on Auburn's diving team.

15 3. I've dedicated my life to diving and I don't know what I would do if I couldn't
16 dive anymore. In high school, I did other things outside of diving, but since becoming a D1
17 athlete at an SEC school, I have truly dedicated my whole life to my sport. I've missed out on a
18 lot of things I used to enjoy in order to work on improving my diving. At the moment, I spend
19 many hours a day training, whether that be in the pool, conditioning, or lifting weights.

20 4. I have accomplished a lot in my diving career thus far. I qualified for the NCAA
21 Zone qualifier seven times and the Junior National Championship four times.

22 5. It is unfair for my roster spot to be taken away after I haven't even been at Auburn
23 for a full year, especially after I have greatly improved my dives since the start of the season.

24 6. Even if I got cut from the team at Auburn, I'm not sure I would be able to transfer
25 anywhere because these cuts are happening at every school. So, no matter what, there will be
26 people who have dedicated their lives to the sport that will no longer be able to dive.

27 7. Impending roster cuts can negatively affect team dynamics. The pressure of these
28 looming cuts is affecting many peoples' mental health. Several very talented athletes are

1 considering quitting in anticipation of potentially being cut.

2 8. I hope that the court stops these unfair roster limits so that students like me can
3 continue to participate in sports we love.

4 I declare under penalty of perjury that the foregoing is true and correct.

5 Auburn, Alabama
6 January 28, 2025

7 

8 _____
9 Kathryn Long
10 NCAA ECID No. 2210690193
11 157 Rudder Court
12 Lexington, SC 29072
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Jack MacKinnon
839 Siesta Key Circle,
Sarasota, FL 34242

January 27, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Jack MacKinnon. I am a current Division I athlete at the University of Nevada and my NCAA ECID number is 2206576255. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Jack MacKinnon

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF JACK MACKINNON**

9 I, Jack MacKinnon, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a 20-year-old college sophomore and football player. Until a month ago, I
11 was a proud Wolverine at the University of Michigan in Ann Arbor. This month, I'll start a new
12 college career as a defensive end for the University of Nevada Wolf Pack.

13 2. I am a member of the Injunctive Relief Settlement Class. I object individually
14 and on behalf of the class.

15 3. I have always loved playing sports – *all* sports. I started playing football in
16 second grade. I also played baseball and basketball. When I attended Cardinal Mooney High
17 School in Sarasota, Florida, I excelled on both the baseball and football teams.

18 4. I worked hard to improve. In football in 2021, as a junior, I helped the Cardinal
19 Mooney Cardinals post a 7-3 record. In 2022, my senior year, I led the team to an 8-3 record,
20 contributing 58 tackles, 36 solo, 26 tackles for a loss, 13 sacks, one pass break up, a fumble
21 recovery, and a blocked field goal. I am most proud of helping my team make it to the playoffs
22 that year. After my senior season, I earned Florida High School Athletic Association second-
23 team All-State honors and was recognized by SBLive Sports Florida on its 2022 All-South
24 Suncoast Football Team.

25 5. In baseball I was a pitcher and outfielder, and college coaches scouted me early
26 on. The University of South Florida (USF) offered me a scholarship to play baseball. The offer
27 of financial aid was important for my family and initially resolved my dilemma over which sport
28 to pursue in college, and I was close to committing to play baseball for USF.

1 6. But I did not stop playing football. Though I performed well on the baseball
2 mound, I was more dedicated to football. My whole life, I loved playing football with my friends
3 and building deep, long-lasting relationships with my teammates and coaches. I missed it so
4 much that even with my generous baseball scholarship, I could not rule out football.

5 7. Something amazing brought me to Michigan. Jack Harbaugh is the father of
6 legendary coach Jim Harbaugh. Coach Harbaugh has since left Michigan to coach the Los
7 Angeles Chargers, but in 2022, he was still coaching at Michigan. While visiting family who
8 happened to live near my hometown in Florida, Jack Harbaugh saw me play and – without me
9 knowing – sent a videotape of me playing football to his son and recommended that he look me
10 up.

11 8. Coach Harbaugh himself contacted me. He said he couldn't offer me a
12 scholarship to play football, but he offered me a preferred walk-on position at Michigan instead.

13 9. I was speechless. As a walk-on, I wouldn't have financial aid. Nor was I offered
14 an academic scholarship. But I would be playing for **Michigan**, one of the most storied college
15 football programs in the country, for **Coach Harbaugh**. It didn't hurt that I loved the school and
16 valued the opportunity to get a degree from such a great institution. I accepted instantly and
17 never looked at another school again.

18 10. My freshman year at Michigan was a dream. I did not see game action, but I
19 loved working hard to support the team every day, even when I was just helping the starters
20 prepare for each game. I met the most incredible friends, and we soon ended up training and
21 rooming together.

22 11. One of my roommates was John Weidenbach, another preferred walk-on. We
23 bonded through our fanatic dedication to football and became fast friends. I respect John for his
24 talent, drive, leadership, and intellect. It was an honor to be his teammate.

25 12. It was John who, in mid-2024, first told me about the potential for roster limits in
26 the *House v. NCAA* settlement. He told me that football teams could be limited to 105 players –
27 far less than the number of guys on the Wolverines. I was disturbed, but at that point it was very
28 up in the air, so I thought we'd all be okay.

1 13. As we went on with the year, however, we started panicking as speculation about
2 roster limits kept lurking. Eventually, the pressure built to where my group of friends realized
3 that the threat of being cut from the team was not theoretical.

4 14. No one from the football staff or university administration said anything to us
5 about whether we were likely to be cut. After discussing at length with my family and closest
6 friends, I came to the hard decision that I would have to protect myself. I did not want to leave
7 Michigan, my team, or my good friends, but I saw that the transfer portal was about to be flooded
8 with players in my exact position, and I couldn't count on having a spot on the team next year.
9 If I wanted to make sure I could keep playing football, I had to leave. So, after a lot of worrying,
10 I finally made the decision to enter the transfer portal in December 2024.

11 15. I got lucky. I received a few offers, and Nevada made me the first one. I was
12 torn about leaving my friends and the incredible opportunity I had at Michigan behind, but I had
13 already committed to protecting myself as much as possible. I visited, enjoyed the team and
14 atmosphere, and accepted the offer. I will have a spot on the team for next year at least and am
15 slotted to be a starter. I am not certain, however, if my roster spot will be available for the
16 following year.

17 16. I know I'm one of the lucky ones, at least today. I was able to transfer to a good
18 school, and I'll keep playing the sport I love. But most athletes will not be as lucky as me.

19 17. The last time I checked, there were over 7,000 players in the transfer portal. No
20 matter what, many football players will not find another home because of these roster limits. It's
21 unfair to pull the rug out from under so many feet and tell them they can no longer play the sport
22 they love – even though their school has a team and wants them – or force them to decide between
23 their school and their sport.

24 18. I deeply miss my group of friends at Michigan. We keep in touch, and we will
25 be lifelong friends no matter what. And if it weren't for John, I wouldn't have known how to
26 voice my objection to the settlement. I never received any sort of notice by email or mail telling
27 me about the settlement and how I could object to it.

28 19. The roster limits are throwing the entire Division I football class into turmoil. I

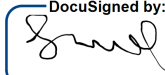
1 should have been given the opportunity to make my decision to enter the transfer portal based
2 on my own merits and experience at Michigan – not based on arbitrary limits.

3 20. The roster limits are wrong and shouldn't be a part of the settlement. I may be
4 just fine, but that is exactly why it is important for people like me to speak up on behalf of others
5 who are unjustly getting their lives destroyed by the roster limits.

6 21. Separately, on their behalf, I object.

7 I declare under penalty of perjury that the foregoing is true and correct.

8 Dated: Sarasota, Florida
9 January²⁷, 2025

DocuSigned by:

EB068F3EB43E440

Jack MacKinnon
NCAA ECID No. 2206576255
839 Siesta Key Circle,
Sarasota, FL 34242

Madeleine MacNeille
10505 Avenida Del Rio
Delray Beach, Florida 33446

January 30, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Madeleine MacNeille. I am a current Division I athlete at the University of Texas at Austin and my NCAA ECID number is 2102107716. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Madeleine MacNeille

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF MADELEINE MACNEILLE**

9 I, Madeleine MacNeille, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a sophomore at the University of Texas at Austin and a member of the
11 NCAA Division I women's tennis team. I am a member of the Injunctive Relief Settlement
12 Class and object both individually and on behalf of the class.

13 2. From the age of 8 years old, I spent countless hours training, with the single goal
14 of becoming a Division 1 athlete. Every day was a testament to my commitment as I spent early
15 mornings and long afternoons at practice. At the age of 14, I chose to leave the school I attended
16 from the age of 4 to attend a new school that accommodated my practice schedule. During high
17 school, my training consisted of 5 hours of time on court each day plus competing on weekends.
18 I missed out on countless hangouts with friends, family events, and regular childhood
19 experiences because I was focused on achieving my goal of playing tennis at a division 1 school.
20 My parents made immense financial sacrifices to support my dream, spending money on
21 training, travel, equipment, and coaching, often forgoing family vacations or time together so I
22 could attend practices and competitions. There were weekends when instead of relaxing or
23 enjoying holidays together, my family would be on the road, cheering me on at events or making
24 sure I had everything I needed to succeed.

25 3. Throughout my tennis career, I've been fortunate to achieve several milestones
26 that I'm incredibly proud of. I was honored to be named First Team All-County, an
27 accomplishment that reflected my dedication and hard work on the court. One of my most
28 significant achievements was becoming my school's first-ever state qualifier for the state

1 championship, where I made it all the way to the finals. I was also awarded the prestigious
2 Scholar-Athlete 'Pride' Award, a recognition that celebrated not just my athletic performance,
3 but my commitment to academics as well. I was also a state doubles finalist and was nominated
4 as Palm Beach County Player of the Year. Perhaps most notably, is that I was able to achieve all
5 these athletic accomplishments while maintaining a 4.6 GPA and graduating as Salutatorian of
6 my high school class. Each of these accomplishments is a testament to my passion for the game,
7 my relentless pursuit of improvement, and the support from my family, coaches, and teammates
8 along the way.

9 4. Upon graduating from high school, I was fortunate to have several collegiate
10 opportunities, but I made the difficult decision to take a gap year to further my training and tennis
11 development in pursuit of my dream of playing at a top-tier Division 1 school. It wasn't an easy
12 choice, especially as all my friends were heading off to college, but I felt that taking this time to
13 focus solely on my game would give me the best chance to reach my full potential. During my
14 gap year, I committed myself to six-hour training sessions on the tennis courts every day,
15 competing every weekend to refine my skills and gain experience. My hard work paid off, as I
16 made significant progress and attracted the attention of several college coaches.

17 5. Despite receiving athletic scholarship offers, I ultimately accepted the
18 opportunity to play tennis at the University of Texas at Austin as a recruited walk-on. I chose
19 UT Austin because of the caliber of their team and the outstanding athletic training and
20 development resources they offered. Throughout the recruiting process, my coach promised me
21 the same opportunities and benefits as the scholarship players, including private lessons, access
22 to personal nutritionists, specialized training professionals, mental health services, meals,
23 tutoring, full medical care, athletic gear, travel costs, and a \$6,000 stipend per year for
24 educational expenses.

25 6. I recently learned through media reports about the potential roster limits that may
26 be imposed if the court approves the settlement. My coach has had limited information to share
27 with me regarding the situation, which has made it difficult to fully understand the implications.
28 I've come to learn that the school recently cut walk-on on other teams. There are currently three

1 recruited walk-ons on the women's tennis team, including myself, who could be affected by the
2 outcome of the settlement. If the court adopts the roster limits, the women's tennis team will be
3 capped at 10 players. If the school chooses to increase the number of scholarships from 8 to 10,
4 unfortunately, all three of the walk-ons would lose our spots on the team.

5 7. The possibility of losing my spot on the roster has been weighing heavily on my
6 mental health, and I know I'm not alone—my teammates are also feeling the stress and
7 uncertainty. The constant worry about roster cuts and the lack of clear communication from
8 leadership is affecting our morale and focus.

9 8. Personally, it's taking a toll on my ability to perform both academically and
10 athletically. The pressure to prove myself on the court, while also keeping up with my studies,
11 is incredibly challenging when I'm constantly wondering if my future with the team is in
12 jeopardy. I made so many sacrifices to get to this point—spending a gap year solely focused on
13 tennis, turning down other opportunities, and choosing this school because of its team and the
14 chance to develop as a player. The idea of not being a part of this team or having to transfer to
15 another school is daunting. I've invested so much into this dream, and the uncertainty about
16 whether it will all come to an end is affecting my overall well-being. It's hard to stay motivated
17 and perform at my best when the future feels so uncertain, and the fear of losing everything I've
18 worked for is ever-present

19 9. Being cut from the team would be an incredibly difficult loss, both emotionally
20 and financially. Emotionally, it would mean losing not only my place on the team but the entire
21 experience I've worked so hard for. The relationships I've built with my teammates and the sense
22 of camaraderie we share have been such a vital part of my college experience. The team has
23 become my family, and the thought of losing that support system is heartbreaking.

24 10. On a financial level, being cut would strip me of several crucial benefits that come
25 with being a part of the team. I'd lose access to private lessons, personal training, tutoring,
26 academic counseling, and the meal plan that allows me to eat with my teammates at a special
27 dining hall. I'd also lose travel costs, medical care, and mental health services—all of which are
28 incredibly important as I balance the demands of being a student-athlete. Additionally, the

1 educational stipend of \$6,000 per year would no longer be available, which is a significant
2 financial burden. My whole college experience is tied to being a member of the team, and the
3 prospect of losing that opportunity is devastating.

4 11. To make matters even more complicated, my parents have already signed a lease
5 for next year that I'm unable to get out of if I were to transfer to another school. The financial
6 and emotional repercussions of losing my spot on the team would be immense, and it's
7 something I'm struggling to come to terms with.

8 12. Faced with the uncertainty of the outcome, I'm now being forced to confront the
9 difficult reality of potentially having to transfer to another school, even though it's very late in
10 the recruiting season to secure another opportunity. The idea of switching schools at this stage
11 feels overwhelming, especially with so many unknowns—like whether I'll even be able to find
12 a spot on another team. If I can't find a new opportunity, I'd be left with no choice but to stay at
13 UT Austin to continue my education without being able to compete. This would mean not only
14 having to navigate a new social and academic environment, but also losing the sense of belonging
15 and community I've built with my current teammates. Their training and competitive travel
16 schedules would no longer align with mine, so I'd have to make entirely new friends and rebuild
17 my college experience from scratch. Another concern is whether my academic credits would
18 even transfer if I did decide to leave. The potential financial impact could be enormous, not to
19 mention the possibility of having to stay in school longer to make up for any credits that don't
20 transfer.

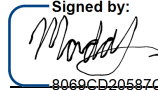
21 13. I respectfully urge the court to consider grandfathering all current walk-ons in its
22 decision regarding the roster limits. For many of us, becoming a part of our teams has been the
23 culmination of years of sacrifice, hard work, and dedication, not only from ourselves but from
24 our families who have supported us along the way. We made the decision to join these programs
25 with the understanding that we would have the same opportunities to develop as athletes and
26 contribute to the team as the scholarship players. The uncertainty surrounding the potential cuts
27 to the roster is having a profound impact on our mental and emotional well-being, and the
28 thought of losing everything we've worked so hard for—especially after making significant

1 sacrifices to get here—would be devastating. Grandfathering the current walk-ons would honor
2 the commitment we’ve already made, ensure that our sacrifices were not in vain, and allow us
3 to continue pursuing our dreams without the added burden of fear and uncertainty.

4 I declare under penalty of perjury that the foregoing is true and correct.

5 Dated: Delray Beach, Florida

6 January 30, 2025

Signed by:

8069CD20587C412...
Madeleine MacNeille
NCAA ECID No 2102107716
10505 Avenida Del Rio
Delray Beach, Florida 33446

Tristan Martinez
4448 Loina Place
Honolulu, HI, 96818

January 15, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Tristan Martinez. I am a current Division I athlete at Clemson University and my NCAA ECID number is 2201423524. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2024.

Sincerely,
/s/ Tristan Martinez

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF TRISTAN MARTINEZ**

9 I, Tristan Martinez, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a junior at Clemson University. Until the beginning of January, I was a wide
11 receiver on its Division I football team. I am a member of the Injunctive Relief Settlement Class,
12 and object individually and on behalf of the class.

13 2. I have played football since I was a kid. In high school, I was able to be a starting
14 wide receiver for my high school team. In 2021, as a junior, my high school won the Hawaii
15 High School Athletic Association state championship. In 2022, I was named first-team All-
16 Conference and Interscholastic League of Honolulu.

17 3. Playing for Coach Dabo Swinney, the head football coach at Clemson, has always
18 been a dream of mine. He is a man of integrity who has achieved incredible results on the field,
19 and I grew up watching his teams win on television. I also followed his public interviews,
20 including after games, and was struck by his integrity. He talked about preparing players for
21 life, which he sees as bigger than winning games. So when I was in high school, I scratched and
22 clawed to have a chance to attend Clemson's high school camps twice: during the summers
23 before my junior year and my senior year. I traveled more than 4,000 miles from my home in
24 Hawaii to attend camp.

25 4. I worked hard at camp, and the coaching staff noticed. After my second trip to
26 camp, Coach Swinney offered me a preferred walk-on spot. I took it immediately. I was
27 absolutely thrilled to play for the Clemson Tigers.

28 5. As a preferred walk-on, I receive a lot of benefits, including access to the football

1 facility, team meals, gear from our sponsors, priority class registration, and academic counseling
2 and tutoring. I am a serious student who hopes to be a lawyer, and I take advantage of all of it.

3 6. My concerns with roster limits started in the summer of 2024 when our head
4 coach, Dabo Swinney, told us about the House settlement. He said that if the House settlement
5 was approved, he would have to cut at least 30 walk-ons like me.

6 7. In November, Coach Swinney called a meeting with all non-scholarship players.
7 He told us that from that point forward the team would be operating under the assumption that
8 the Court would approve the House settlement. As a result, he told us that he would make final
9 cuts to ensure the roster was under the 105-player limit by August 2025. He also told us that if
10 we wanted to enter the transfer portal, we could have a meeting with him to talk about it.

11 8. Coach Swinney told us in no uncertain terms that the NCAA is making a huge
12 mistake. He believes that the NCAA is not considering how vital walk-ons are to football
13 programs. Coach Swinney knows that you can't run a productive football practice without walk-
14 ons. He was a walk-on at Alabama, where he eventually received a scholarship. He described
15 the day that he learned he would have to cut the walk-ons as the worst day of his coaching career.
16 He continues to be a man of integrity.

17 9. After November, I had two one-on-one meetings with Coach Swinney. At the
18 first meeting, I asked him if he planned to keep me on the team if the roster limits went into
19 effect. He said that he was not, and I would likely be cut. At the second meeting, Coach Swinney
20 told me that it was very unlikely that I would have a roster spot next year if the roster limits were
21 approved with the settlement.

22 10. On January 10, I had a call with my position coach, who confirmed that I probably
23 would not have a roster spot for my senior year.

24 11. The shock of roster limits has been incredibly sudden. One week I was dressing
25 out to play in the College Football Playoff against Texas. The next I was cleaning out my locker.
26 The whole process has been heart-wrenching.

27 12. I worked my whole life to get a shot to play at this level. I have been playing
28 football since I was a kid. I played in middle school. I played in high school. The amount of

1 work it took to get on a Division I program was huge. For this to be taken away by people in
2 suits who I have never met is incredibly disappointing.

3 13. These roster limits have prevented me from achieving my dream of playing as a
4 Clemson Tiger for four years. Without them, I still have a chance to play for my senior year. I
5 know that many others are in my same position, including some of my Clemson teammates.
6 Please do not approve these roster limits.

7 I declare under penalty of perjury that the foregoing is true and correct.

8 Dated: Clemson, South Carolina
9 January 15, 2025



Tristan Martinez
NCAA ECID No. 2201423524
4448 Loina Place
Honolulu, Hawaii 96818

Marin Maycotte
2301 Shoal Creek Blvd
Austin, TX 78705

01/26/2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Marin Maycotte. I am a current Division I athlete at University of Washington and my NCAA ECID number is 2211729273. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Marin Maycotte

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF MARIN MAYCOTTE**

9 I, Marin Maycotte, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman at the University of Washington and am a member of the NCAA
11 Division I women's rowing team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 2. My entire life has been dedicated to this sport since I was 13 years old. Before
14 rowing I was lost. I wasn't confident, I wasn't strong, I wasn't the person I wanted to be. This
15 sport single-handedly saved me. As long as I can remember, I have prioritized my training,
16 mental energy, and teammates above all else. While it has been a sacrifice, it is one I would
17 make over and over again. Rowing requires an unparalleled level of dedication. It's the first thing
18 on my mind when I wake up early for practice and the last thing I think about as I fall asleep
19 after an exhausting, rewarding afternoon of rowing. I've invested countless hours outside of
20 practice on the rowing machine and in the weight room, and I've trained year-round—even
21 during summer and winter breaks. Besides my own home, I have spent the most time of my life
22 on the dock, in a boat, and on a rowing machine. This journey has shaped my identity and
23 transformed my life in ways I never imagined. I would do anything to continue this journey. My
24 coach would have to physically rip the oar out of my hand before I would.

25 3. When you commit to a sport like rowing, it becomes more than just a competition.
26 It's an investment, a family, and an outlet for stress. My journey began humbly—I started out in
27 the slowest boat on my team. For the first time in my life I was okay with not being the best. I
28 had tried so many other sports, but I always quit the next year because I wasn't automatically

1 ‘talented.’ Rowing was the first sport I stuck with. Instead of being discouraged, I found joy in
2 the process and worked harder. Slowly but surely, I improved. I still remember every personal
3 record I’ve achieved, each one a testament to countless hours of grit and determination. By my
4 senior year of high school, I reached a benchmark that set me apart, earning team captain honors
5 twice and leading my team to historic successes. Rowing is unique in how it demands time,
6 patience, and relentless effort to truly master. Most people don’t even start rowing until high
7 school, and it can take years to reach your full potential. This sport taught me the value of
8 perseverance and showed me the strength I didn’t know I had. My dedication inspired my
9 teammates to push their limits as well, and together we achieved incredible things. I was
10 fortunate to compete at Nationals four times, along with many other races. My team was an
11 underdog team, so we had to work even harder when all odds were against us. When our hard
12 work paid off, it felt even more special because we had earned it against the toughest challenges.
13 Junior year, I won the erg hammer award because I truly pushed myself past my limits every
14 single day. I still remember lying in the dirt after the hardest workouts, covered in cobwebs,
15 staring at the sky with a smile on my face. That became what I was known for—pushing
16 boundaries and inspiring others to do the same. I was honored to be part of history for my club
17 as our boat achieved rankings higher than ever before, and those moments are etched in my heart
18 forever.

19 4. When I went through the recruiting process, honestly I had no idea what to expect.
20 I was told many times over that I wasn’t tall enough or fast enough to row at Division I level.
21 But I refused to let others define my potential. I still remember my first recruiting call, I was
22 sitting on my living room couch shaking with a notebook in my lap filled with questions and
23 notes. I was nervous because I felt like no one would want me. When I received my first call
24 from the University of Washington, I knew it was the perfect fit. The program’s culture of
25 excellence, resilience, and hard work resonated with me. I wanted a team who would sacrifice
26 as much as I have to be here and truly enjoy putting in the effort. The way the coaches talked
27 about the sport was unlike anything I had ever seen. The dedication, sweat, and tears are what
28 makes this sport special. I turned down incredible opportunities, including offers from the Naval

1 Academy and UC Berkeley, to join a program where I knew I would be pushed to my limits. I
2 could have easily chosen a school that I would be a top athlete on the team, but I chose this one—
3 one of the most competitive programs so I could challenge myself.

4 5. I'm only a freshman, but I came here with big dreams: to one day compete at
5 NCAA Championships. That dream requires time, patience, and development—things that roster
6 limits would jeopardize. I believe myself and every other athlete has the right to develop all four
7 years. I had no idea there would be an expiration date on our success. Rowing is a sport that
8 takes years to master. It's not uncommon for athletes to start at the bottom and eventually become
9 key contributors. One of my teammates, who spent her entire first year training on land, is now
10 an essential part of our team's success. If roster limits had been in place, her potential—and our
11 team's success—might never have been realized. The team isn't just about being the fastest
12 person, it's about building each other up from the bottom. I love this team more than I could
13 have imagined and I cannot imagine being ripped away from the sport and family I love.

14 6. When our head coach informed us about the proposed roster cap, it felt like the
15 ground was pulled out from beneath us. The news was met with silence, shock, and tears. This
16 proposal threatens to undermine the very foundation of our team. Rowing is a sport built on
17 camaraderie and mutual support. Cutting athletes not only limits individual potential but also
18 weakens the team's spirit and dynamic.

19 7. This uncertainty has taken a significant mental toll on my teammates and me.
20 Rowing is already a demanding sport, both physically and mentally. Adding the stress of
21 potential cuts has affected our focus, our morale, and even our academic performance.
22 Personally, I've found it hard to concentrate on my studies, knowing that everything I've worked
23 for could be taken away.

24 8. If I were to be cut, I would lose more than just a spot on the team. I would lose
25 my potential to earn financial aid, access to academic support, and the unique bond I share with
26 my teammates. The dining halls, the housing arrangements, the shared laughter after a grueling
27 practice—all of it forms the fabric of my college experience. My identity as an athlete is
28 intertwined with my sense of purpose and belonging. Losing that would be devastating.

1 9. I've had to consider the unthinkable: entering the transfer portal. But transferring
2 isn't as simple as it seems. There's no guarantee that other programs will have spots available.
3 Even if I found another team, transferring could disrupt my academic progress, as not all course
4 credits transfer seamlessly. I chose the University of Washington not only for its rowing program
5 but also for its academic excellence. Leaving would mean giving up on both my athletic and
6 academic dreams.

7 10. This proposal feels particularly unfair in light of Title IX. Allocating resources
8 disproportionately to football while capping opportunities for women's rowing sends a message
9 that female athletes are less valued. Rowing is one of the few sports that provides opportunities
10 for women at this level, and these proposed limits threaten to roll back decades of progress. Why
11 should men's sports get more spots, money, and opportunities when we contribute just as much.

12 11. I respectfully urge the court to reject this proposal. Roster limits would not only
13 harm individual athletes but also erode the culture of perseverance, inclusivity, and teamwork
14 that makes collegiate rowing so special. Please allow us the opportunity to continue pursuing
15 our dreams, growing as athletes and individuals, and contributing to the legacy of this sport.

16 I declare under penalty of perjury that the foregoing is true and correct.

17
18
19 Dated: Seattle, WA

20 January 26, 2025



Marin Maycotte
NCAA ECID No. 2211729273
2301 Shoal Creek Blvd
Austin, TX 78706

Raini Mayo
2501 W Whittaker Close
Williamsburg, VA 23185

January 29, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Raini Mayo. I am a current Division I athlete at Liberty University and my NCAA ECID number is 2310144728. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Raini Mayo

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF RAINI MAYO**

9 I, Raini Mayo, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a Freshman at Liberty University and am a member of the NCAA Division
11 I women's Track and Cross-Country team. I am a member of the Injunctive Relief Settlement
12 Class and object both individually and on behalf of the class.

13 2. When I decided that I wanted to pursue running at the collegiate level it cost me
14 a lot of time and effort. I spend most of my days either going to practice or to races competing
15 for my team. This often made me miss out on other opportunities like other extracurricular
16 activities and social events. In addition, pursuing a collegiate running career also cost me the
17 ability to also pursue opportunities to pursue a collegiate basketball career.

18 3. In high school, I was the second scoring runner that helped lead our team to a
19 Cross-Country state championship. I received All-State honors in both Track and Cross Country
20 my Junior and Senior year. I finished my high school career placing 3rd at our Track State
21 Championship at Liberty University where I would go to run the next year. Collegiately, I was
22 the fourth Liberty freshman to break 10:20 in the 3k. Additionally, I was 2 times All Region,
23 and an All-State basketball player.

24 4. Being torn between whether to pursue Division 2 or 3 basketball collegiately or
25 running, I arrived at a late decision to run at the collegiate level. I was being recruited by a few
26 Divisions I programs in running and then additionally reached out to schools that I had interest
27 in being a part of their team. During my unofficial visit to Liberty, I realized that being on this
28 team would be an incredible opportunity. I was offered a spot as a preferred Walk-on and

1 thought to clarify what that would mean for my potential to stay on the team throughout my
2 college time. My coaches led me to believe (because I believe this is what they truly believed
3 to be true) that I would have a spot for all 4 years. After making a commitment to join the team
4 at Liberty University, I didn't speak to other schools or explore other potential opportunities in
5 any sport.

6 5. A couple days prior to hearing officially, I began to hear of rumors that the next
7 year we would have the roster limits that would threaten my ability to continue to be a part of
8 the team; However, I wasn't completely aware of the reality of the situation until our athletic
9 director at Liberty came and explained the situation to our Track team once they knew it was
10 happening. Later that night, the coaches held a meeting with us to further explain that because
11 of the new roster limits, more than half of our women's distance team would be cut. I don't know
12 exactly where I stand on the team, but I know that I am at risk of one who could be cut. It was a
13 very heavy emotional time as we began to grieve what we would lose in terms of friendships and
14 opportunities and trying to process the shock that this news blindsided us with.

15 6. This decision has taken its toll by changing our team dynamics. Although, our
16 program has done a great job of putting on friendly faces and continuing to be kind toward each
17 other. I believe there is an undercurrent that has changed our dynamics. There is a weight that
18 those of us who may be on the bubble, or those that feel they are going to be affected carry where
19 every poor performance is something that may seal our fate. We feel a lot of stress to not have
20 any bad days and face a temptation to disregard our bodies because this might be our last
21 shot. We want to continue to be great teammates, but subconsciously know that if we don't beat
22 that girl, she may take the roster spot. We are told not to worry, but we know that if we don't
23 perform well, we may lose our opportunity to have this dream continue. Our coaches have been
24 very compassionate about the situation; however, this further adds to the sorrow since we care
25 deeply for them, and we continue to see the burden this places on them. In general, it has added
26 a mental strain to all our relationships spoken and unspoken. This surfaces in things like not
27 wanting to share our successes because we know our teammate may not be in the same place, or
28 just in thinking about the sadness of our team not being the same next year.

7. If I were cut from this team, I would lose the access to resources which include studying our athletics center and eating at our athletic dining hall. I would lose the eye opening experiences that travel and competing against different universities provide. But most importantly I would lose access to hours together with teammates who have become like family and my coach who since being at Liberty for my first year in college has been a mentor and encourager to me even outside of running. Without them I don't know what the college experience is going to entail. As a college athlete, we train most of the hours that we are not in class, so my life in college will be totally remade. And without our coaches, specifically my own group Coach, as a readily available resource I would lack the daily guidance that he provides me and don't know who in a "regular" student experience would fill this void

8. I haven't decided if I want to enter the transfer the portal but because I am currently selected for the nursing program here. Transferring will possibly jeopardize my current career path of being a nurse and as a military brat I was really looking forward to spending 4 years in one place. I will choose to stay at Liberty and have to lose my dream of working my way into being a contributor on the team.

9. I strongly object to the roster limit decision. Not only, is it not right that current affected athletes were told one thing and then rules changed so suddenly that it affected them with no grandfathering in but also for those high school athletes that will never be given the opportunity that I got, if even for a year.

Dated: Lynchburg, Virginia
January 29, 2025

Signed by:
Raini Mayo
AB068F6532CB440...
Raini Mayo
NCAA ECID No. 2310144728
2501 W Whittaker Close
Williamsburg, Virginia 23185

Cassidy McArthur
5320 NE 187th St
Lake Forest Park WA, 98155

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Cassidy McArthur. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 2307958825. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Cassidy McArthur

1 **UNITED STATES DISTRICT COURT**
2 **NORTHERN DISTRICT OF CALIFORNIA**
3 **OAKLAND DIVISION**

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

7 **DECLARATION OF CASSIDY MCARTHUR**

8 I, Cassidy McArthur, hereby declare as follows pursuant to 28 U.S.C. §1746:

9 I am a freshman at the University of Washington and am a member of the NCAA Division I
10 women's rowing team. I am a member of the Injunctive Relief Settlement Class and object
11 both individually and on behalf of the class.
12

13 Since I have been in middle school I have been attending training six days a week. By
14 the time I was a sophomore in highschool I had sacrificed countless moments with my family,
15 friends and community. Although I got used to saying, "sorry I can't have practice" it never got
16 easier. I was constantly asked whether or not it was worth sacrificing so much. However, when
17 I committed to row Division I at my dream school those questions stopped. My loved ones
18 could finally see why I had pushed myself through all those long, painful and exhausting
19 training sessions for the last 5 years. Entering my freshman year of college athletics I was
20 prepared to do it all over for the sport I love so deeply. Then I learned that everything I have
21 worked for could all come to an end. January of this year we had a team meeting where we
22 learned about the potential for a new roster limit. We were told how limiting this would be for
23 both current and future rowers at Washington. Our program relies on the development of
24 athletes. Having a 68 person roster, which would need to be finalized by December would have
 numerous negative impacts on our team. Not only would it prevent walk-ons from learning the

1 sport of rowing, it would also prevent recruits from receiving the experience our program is
2 meant for, which is development. As our coach told us the news, she reminded us that this is
3 about more than a roster limit. This is the legacy of women's athletics. And unfortunately this
4 is just one more way that women have to fight for the positions they have earned. Therefore we
5 can not stand aside and allow women to be pushed out of athletics.

6 Since learning about the roster cut, there has been a sense of gloom amongst our team.
7 As if being a full time student-athlete was not enough, my teammates and I are now left
8 wondering whether there will be a place for us come December. It has taken a toll on the
9 mental health of many athletes. The anxiety associated with next year is immense. The
10 potential dread of transferring to continue the sport you love, or to stay and earn your degree
11 while sacrificing your athletic dreams is ongoing. These are just a few reasons the NCAA
12 cannot put this roster cap in place. There would be thousands of Division I athletes unjustly
13 stripped of their sports and their athletic futures.

14 I declare under penalty of perjury that the foregoing is true and correct.

15 Dated: Seattle, WA

16 January 26, 2025



Cassidy McArthur
NCAA ECID No. 2307958825
5320 NE 187th St
Lake Forest Park WA, 98155

Grace McCardle
1371 Bundoran Dr
North Garden, VA 22959

January 27, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken,,

My name is Grace McCardle. I am a current Division I athlete at William & Mary; my NCAA ECID number is 2303808087. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Grace McCardle

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF GRACE MCCARDLE**

9 I, Grace McArdle hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman at the College of William and Mary and a member of the NCAA
11 Division I Women's Swim team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 2. Our coaches have explained to us that roster limits, if implemented, will cause
14 our team to incur and suffer from cuts of four of our teammates. We do not yet know if these
15 will be athletes currently on our team, incoming freshmen, or a combination. We do not want
16 this and feel we should not have to worry about losing teammates or have any concerns
17 surrounding our own position on the team. Added stress does not help performance or team
18 spirit. Nor will a limited roster benefit our team.

19 3. We function as a team in and out of the pool. We eat together, study together,
20 relax together, and live together; we have strong mentoring systems on our team and pride
21 ourselves on helping one another in and out of the pool; we are a tight, supportive group. We
22 worked incredibly hard throughout high school in order to have this opportunity; we all want to
23 remain on this team and at our school, together. We do not feel roster limits help our team or our
24 sport, but they will negatively impact those who are cut and our team at large.

25 4. I ask the Court not to approve the roster limits in the *House v. NCAA* settlement.
26
27
28

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Williamsburg, VA

January 27, 2025

Signed by:

Grace McCardle

Grace McCardle

NCAA ECID No. 2302808087

1371 Bundoran Dr.

North Garden, VA 22959

Perry McLoughlin
21 Orchard Farm Rd
Port Washington, NY 11050

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Perry McLoughlin. I am a current Division I athlete at University of Washington and my NCAA ECID number is 2208650896. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Perry McLoughlin

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF PERRY MCLOUGHLIN**

9 I, Perry McLoughlin, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a Sophomore at the University of Washington and am a member of the
11 NCAA Division I Women's Rowing team. I am a member of the Injunctive Relief Settlement
12 Class and object both individually and on behalf of the class.

13 2. In my high school career, I participated in 6-8 practices per week, and this is what
14 it took to have the chance of being a Division I college athlete; also include sacrifices, having to
15 miss other activities or social events.

16 3. During my recruiting process, I was looking for a team where I could excel and
17 be surrounded with the most supportive teammates and staff. University of Washington offered
18 the most welcoming environment where I could learn and grow through my four years here and
19 strive to work for scholarships based upon boating and performances. This gave me the
20 opportunity and incentive to learn from every experience and grow alongside my teammates in
21 the most supportive environment.

22 4. I was informed about the roster limits just recently from my head coach, as a way
23 to spread transparency about the issue. As just one of just over 100 women's rowers at the
24 University of Washington, my whole entire team will be impacted. Close to half of our team will
25 be left with no opportunity to row at this program any longer, when they have dreamed their
26 whole lives of coming to Washington and adding to our legacy. These limits will impact not only
27 the participation of our team, but the participation of our team in fall events, events we've been
28 participating in for years. These races are key events in our season and help build our racing

1 experience early on in the season.

2 5. These roster limits and events are taking a major mental toll on my teammates
3 and I and have inevitable impacts on our performance on the water and in the classroom.

4 6. If I am cut from the team, I will lose academic tutoring, academic counseling,
5 mental health counseling, nutritional counseling, my meal plan, medical plan, and most of all,
6 my support system of teammates and staff.

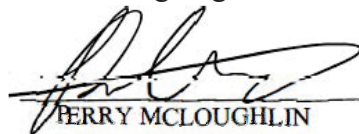
7 7. With these threats of roster limits, I have to consider my opportunities away from
8 this team, the team that has given me the most wonderful experience in this sport of rowing yet.
9 Even with the thought of transferring, I'm worried I will never find another program like this one
10 and scared I will not even be able to find a coxswain roster spot on a team. This brings threats to
11 my mental health, my academic career, and my rowing career.

12 8. I beg of you, please rethink your decision on these roster limits and consider how
13 this is detrimental to the wellbeing of not only thousands of athletes, but of our sports that we
14 have worked so hard as women to achieve.

15 I declare under penalty of perjury that the foregoing is true and correct.

16 Dated: Seattle, Washington

17 January 26, 2025


PERRY MCLOUGHLIN

NCAA ECID No. 2208650896
21 Orchard Fann Rd
Port Washington, NY 11050

Faith Meyer
1575 SW 134th Ave
Beaverton, OR 97005

January 22, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Faith Meyer. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 2106196406. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Faith Meyer

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF FAITH MEYER**

9 I, Faith Meyer, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman at the University of Washington and am a member of NCAA
11 Division I Women's Rowing team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 2. Becoming a Division I college athlete demands unwavering dedication and
14 significant sacrifice. As a high school athlete, I committed around 5 hours a day to sports—
15 whether it was practice, lifting, or watching film—often with little to no days off, totaling 15–
16 20 hours a week. I regularly missed school for tournaments, which disrupted assignments and
17 exams, and sacrificed holidays and family events for competitions and travel. My social life was
18 limited, as friends enjoyed weekends and vacations while I was either training or competing.
19 The physical and mental toll was immense, as I pushed through injuries, fatigue, and constant
20 pressure to perform, all while juggling academic responsibilities. Ultimately, becoming a D1
21 athlete required a lifestyle fully dedicated to the sport.

22 3. During my high school basketball career, I achieved numerous accolades,
23 including a state championship, three league championships, and several tournament titles. I was
24 honored with MVP, Most Improved Player, and Most Inspirational Player awards, along with
25 being named First Team All-League twice and Second Team All-League once. Additionally, I
26 earned a spot in the prestigious OSAA 10-Foot Club.

27 4. As I've shared above, my dedication and passion for basketball have been
28 unwavering throughout my high school career. This hard work led to offers/ interest from four

1 Division I schools, over 10 Division II schools, as well as several Division III and NAIA
2 programs for basketball. I also had interest from a Division I school, the University of
3 Washington, regarding their rowing program—a sport I had never even heard of before April
4 2023. Curious about the opportunity, I decided to explore it. Throughout the recruiting process,
5 I focused on finding a program that valued team chemistry, passionate and supportive coaches,
6 determination, hard work, and grit—qualities like integrity, excellence, perseverance,
7 camaraderie, and tradition. Of all the schools I spoke with, the University of Washington
8 embodied these values in every way. Despite having no rowing experience, it felt like the place
9 where I truly belonged. I took a leap of faith and decided to become a Woman of Washington.
10 My mindset going into this was clear: I wanted to compete for four years, knowing that the
11 university had a track record of success with walk-on athletes. They spoke of the potential I
12 could unlock if I gave everything I had, and I knew that by fully committing, they would give
13 everything they had to help me become the best rower possible.

14 5. On January 17th, 2025, we were called into a team meeting regarding the NCAA
15 House Settlement. Our coach delivered the difficult news that the women’s rowing roster cap
16 would be reduced to 68, meaning that nearly half of the talented athletes on our team would no
17 longer have a place on the roster next year.

18 6. This situation is undoubtedly taking a significant toll on the athletes, increasing
19 stress and pressure to perform both athletically and academically. Despite our best efforts to
20 manage it, it’s also beginning to affect our team dynamic.

21 7. If I find myself without a spot on the team next year, I will lose my opportunity
22 to earn essential financial aid, and many helpful resources, including my dining plan, tutoring,
23 academic counseling, mental health resources, and medical insurance. Additionally, I would lose
24 my sense of identity and purpose as an athlete. Choosing the University of Washington’s
25 women’s rowing team was a decision I made based on everything it represented, and now,
26 without that opportunity, I would also lose the chance to continue competing at the collegiate
27 level. After taking a significant amount of time off from basketball, it would be impossible for
28 me to return to that sport and compete seriously at this level.

1 8. As a result of the roster limits, I am faced with a difficult decision about what
2 path is best for me. Should I enter the transfer portal and potentially switch schools, which could
3 impact the quality of my academics? Or should I remain at the University of Washington, risking
4 the possibility of having to stop competing altogether? This decision weighs heavily on me, and
5 the uncertainty surrounding the timeline only adds to the overwhelming nature of the situation.

6 9. In conclusion, Judge Wilken, I urge you to consider the significant impact the
7 NCAA House Settlement will have on female athletes and the toll it will take on us. Having
8 personally experienced the implications of Title IX, I've seen firsthand how male athletes often
9 receive priority—whether in fan attendance, practice times, or resources—despite our women's
10 teams being top-tier. Just when it seemed like progress was being made for women in sports,
11 this settlement feels like a step backward. Women's sports are still in the early stages of growth,
12 and if given the chance, we can unite to raise awareness and advocate for the continued support
13 of women in athletics.

14 10. Specifically regarding rowing, the proposed roster cap will have a devastating
15 effect. Rowing development takes time—athletes often require years of physical and technical
16 development. Teams like ours, which consistently contend for conference and national titles, are
17 made up of athletes who progress over four years. It's not uncommon for student-athletes to
18 spend their first year or more developing before competing at a championship level. The roster
19 cap could remove these athletes at a critical stage of their development, before they have had the
20 opportunity to compete at the highest levels.

21 11. In women's rowing, most athletes don't peak until their late 20s, making their
22 college years crucial to long-term success—especially for Olympic rowing. Many of
23 Washington's Olympic medalists, both from the U.S. and internationally, began their careers in
24 development boats at UW, and would have likely been cut under the proposed December 1
25 deadline. Walk-ons in rowing differ from those in other sports. Many are accomplished athletes
26 from other disciplines who learn rowing from scratch when they arrive at university. We are a
27 quarter school, beginning training in late September, so the December 1 deadline leaves us with
28 only two months to prove ourselves and for coaches to finalize the 68 athletes who will compete

1 in the spring.

2 12. With just 68 spots, illness or injury leaves little room for replacement. Some
3 teams may struggle to field full lineups, and the timing of the roster cap doesn't account for
4 student-athletes' well-being. The December 1 deadline falls during a critical academic period
5 when student-athletes are preparing for final exams. Furthermore, the transfer portal opens after
6 the roster cap deadline, meaning those who enter the portal will do so during a time of lower
7 demand, reducing their chances of finding opportunities to compete that year.

8 13. This decision will have far-reaching consequences for both the development of
9 athletes and the future of women's sports, and I hope you will reconsider its impact on the
10 athletes who are striving to reach their potential.

11 I declare under penalty of perjury that the foregoing is true and correct.

12
13
14 Dated: Seattle, Washington

15 January 22, 2025



Faith Meyer
NCAA ECID No. 2106196406
1575 SW 134th Ave
Beaverton, OR 97005

Isabel Michaelson
311 Church Ave
Mukilteo, WA 98275

January 27, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Isabel Michaelson. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 2209658080. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Isabel Michaelson

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF ISABEL MICHAELSON**

9 I, Isabel Michaelson, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman at the University of Washington and am a member of the NCAA
11 Division I women's rowing team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 2. I have put in endless hours of training to get to this program. I would wake up by
14 choice at 3:50 every morning during the weeks in spring season and drive 30 miles to Seattle to
15 practice with another club before school. I would then turn around and get to class barely on
16 time and go to practice with my high school team after classes. I have worked with a number of
17 different teams to get good enough at coxing to come to Washington. I have gone through years
18 of self-coaching and bringing myself to my mental limit just to get a chance to be on this amazing
19 team.

20 3. I have competed at the Head of the Charles regatta 4 times with different teams
21 and medaled this year. I won 9 medals at the Northwest Masters regional championship in one
22 year. I have won the Husky open men's 60+ 8 event and the Windermere men's 60+ event. I
23 have been invited to all of the U.S. Rowing pathways camps, including ODP where I won gold
24 in the women's 1v 8, Selection Development where I won gold in the women's 1v 8 open
25 category against U23 dev boats and other collegiate programs, and Selection camp where I won
26 gold with my 8 at Canamex.

27 4. I have always wanted to cox for Washington. Having lived in state my whole life
28 I have known about the boys and the women in the boat since I started coxing. Washington has

1 always been a machine. Washington rowing is an intense, well-run, absolutely massive beast of
2 a team and I wanted to be a part of it. I wanted to be a part of the ‘meat grinder’ that you come
3 out of with some of the most talented women in the country with. It’s called coxswain U for a
4 reason. 10 Olympic women’s 8+’s have been coxed by someone from UW. I have dreamed about
5 going to the Olympics since I was 12 and did everything I could to get myself to coxswain U so
6 I can go about pursuing that goal.

7 5. Our Coach Yaz told us about the roster limits in a team meeting. She told us the
8 cap would be 68. This is including some staff, but we currently have 157 people in our team
9 group chat. Over half of this amazing team is going to be crushed. Everyone at Washington
10 wants to be here with every fiber of their being, that’s why it’s such an amazing program. Yaz
11 told us that she will do everything she can to help us but I know that if we get cut, a lot of us will
12 never row again. I personally don’t see myself happy anywhere but Washington. I have big
13 dreams that I want the chance to chase and I can’t do that anywhere but here.

14 6. I am incredibly worried about this. I came to Washington to row. I don’t even
15 have a major. Rowing is my life and if I can’t do it anymore I don’t know where that will leave
16 me. When we found out about these roster limits the team and myself were in tears. This is
17 crushing. The NCAA can’t just cut our team in half. This is my family and I love and care about
18 every one of them. I can’t imagine not being able to see my team every day. It’s hard to focus
19 on school when your purpose for being there is at risk.

20 7. I will lose just about everything if I am not on this team. I will lose my friends,
21 my purpose for attending Washington, my long-term goals, my motivation and the best part of
22 my life. I will lose access to free meals so I can afford books, therapy, medical care, tutoring,
23 academic support, and nutritional support.

24 8. My family is trying to save up for my sister’s college fund and a lot of that has to
25 come out of mine. My sister is my best friend and has struggled horribly with her mental health
26 her entire life. School is something incredibly important to her and if my parents can’t afford her
27 tuition the effects will be extreme. I could lose my sister. I need to help her get to a better place
28 and I think college is the way to do that. I need to cut as many costs as I can for her.

9. I don't even want to think about transferring. If I can no longer compete for Washington I will drop out of school. There is no point in me going to college and taking away from my sister's fund if I don't know what I want to do. I am at Washington to row and I can't imagine myself happy doing anything else.

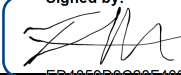
10. Please do not approve the roster limits. I have worked too long and hard to get here. I have struggled with internal and external battles since 7th grade to continue rowing. I have had to switch to 3 different teams and cox for multiple to get a chance to come here.

11. My team is my family. I am happier now than I have ever been in my life. I want to do everything I can to try for the Olympics. I need to be on this team to do that. I have amazing coaches here dedicated to making this team as fast as possible and I don't want to lose the privilege to be taught by them. If I can't row I feel like I'm starting my life from square one. Please don't let this happen.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Mukilteo, WA

January 27, 2025

Signed by:

 ED4859D9C28F403
 Isabel Michaelson
 NCAA ECID No. 2209658080
 311 Church Ave
 Mukilteo, WA 98275

Reid Miller
133 West Franklin St. #438
Chapel Hill, NC 27516

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Reid Miller. I am a current Division I athlete at the University of North Carolina and my NCAA ECID number is 1905586465. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Reid Miller

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF REID MILLER**

9 I, Reid Miller, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a Junior at the University of North Carolina and am a member of the NCAA
11 Division I Men's Swim team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 2. The work and effort it took to have a chance of being a D1 college athlete is
14 immense. I spent my childhood and teenage years working 30+hrs/ week training intensely hard
15 for the opportunity to swim at the D1 level. I had to set aside life known by most young people
16 in order to be competitive in this sport. To compete at the top in swimming, it's imperative you
17 train mornings and evenings 5-6 days/week. Many competitions are held during the week a
18 dozen times a year, for which I missed school. I missed school field trips, I wasn't able to
19 participate in other extracurriculars or clubs, social gatherings, prom, homecoming etc. At one
20 time I was a very good baseball player, a sport that I had to give up playing in order to remain
21 competitive in swimming. I wasn't able to work a job, swimming is a full-time job. The time it
22 takes to train for this sport is mentally and physiologically taxing. You leave a long day of
23 training and classes at school only to get home to manage your academic studies and your
24 recovery so that you're able to train hard again the next morning. Swim is a sport requiring
25 dedication and specialization, swimmers have to sacrifice so much to compete in this sport.

26 3. Among my list of achievements that attracted college coaches to recruit me
27 include State Champion 100 Free 2022, three-time State Champion 50 Free 2020 2021 and
28 2022. I set the state championship record in the 50 free and 100 free as a high school Senior. I

1 am a Scholastic All-American. I was named my high school's Athlete of the Year in 2022. I
2 have always been a strong student both in the classroom and in the pool, I have a high GPA, my
3 work ethic is highly regarded by my coaches and teammates. I was the exact caliber of athlete
4 college coaches were looking to add to their roster.

5 4. I committed to swim for the University of North Carolina for 4 years with athletic
6 scholarship for all 4 years. I had many offers from a dozen schools, and chose UNC for many
7 reasons some of which include an athletic department that supports its athletes, the coaches here
8 are as genuine as they come, a top program that tailors training by specialization, a combined
9 Men's/Womens team that trains together, the strong academics offered at UNC, the quality
10 professors and fellow students at UNC, the variety of majors offered, the opportunity to develop
11 leadership skills along with my athletic and academic pursuits, the opportunity to grow with a
12 program aspiring to climb into the NCAA Top 10. I am currently in my Junior year, and my
13 experience has been everything I hoped it would be. I am very happy here at UNC with my
14 coaches, teammates, academic and leadership pursuits.

15 5. The news of roster limits is startling, to say the least. We've been told that these
16 rules will be implemented by the NCAA, and coaches have no choice but to abide by them
17 regardless of how they feel. It's an awful situation for student-athletes and coaches alike.
18 Coaches made guarantees to their athletes, signed into contract, guarantees they otherwise would
19 keep. I have friends and teammates that have already been cut from other D1 teams across the
20 country, and many more will be affected in the coming months. With my own team no cuts have
21 been made yet, but we know there will be, it's a matter of time. And this timing couldn't be
22 worse; Our championship season is upon us right now, we have Conference Championships
23 (ACC's, SEC's etc) in less than a month with NCAA's a couple weeks after that. We've been
24 training extremely hard since August, not to mention our whole life leading up to this season,
25 for this opportunity to compete at ACC's and NCAA's. And now with worry of the state of our
26 sport, the state of our program, our teammates' positions on the team, along with our own
27 individual position on the team swirling around in our minds.

28 6. Absolutely this is taking a mental toll on me and my teammates, from the top of

1 the roster to the bottom, including the coaches. Every teammate on a swim team has a job to do,
2 whether you're a point scorer in meets, a leader in the planning room, or a practice lane lead in
3 the pool, every swimmer on the roster has value. We're all uncertain about your standing right
4 now, when we've been guaranteed something and it's being swept away, at no fault of our own,
5 we're being disregarded as a number, there's nobody that has our back. Your guarantee you
6 worked so hard for, your NLI contract, isn't a guarantee anymore. In a sport that's already
7 mentally and physiologically taxing, it's extremely hard to push forward right now academically
8 and athletically not knowing what your future looks like.

9 7. If cut, you'd lose your identity, your purpose, you're why. You'd lose your entire
10 friend group and support network. You'd lose your award money which you already earned and
11 was promised to you in your NLI. You'd lose access to your campus support services; your
12 coaches who are your champions in life, the athletic trainers and medical team, tutoring and
13 study table space in Loudermilk, athletic academic counselors, early priority registration for
14 athletes, athletic meals at The Training Table, athletic academic incentive awards. Life without
15 your sport would look completely different than life with it. This loss is significant and
16 devastating.

17 8. This is an absolutely awful situation to be in. If the NCAA proceeds with these
18 roster cuts, lawmakers will have failed athletes and college sports as a whole. Losing a roster
19 spot, something you were guaranteed in writing, is devastating, for that to be taken away by a
20 body of authority, at no fault of your own, is so damaging to these athletes who want nothing
21 more than to earn their education while competing in their sport. They're losing the opportunity
22 they've worked for their entire life due to external factors that they have no control over. There's
23 no recovering from this. For each athlete, they'll handle this differently depending on their
24 individual circumstance. Entering the already crowded transfer portal will not help many if any
25 at all, as with this ruling, all programs are having to make cuts, there will be no open spaces to
26 fill with athletes in the portal. Being cut for no fault of your own is devastating enough to result
27 in many athletes taking a gap year to regroup. For college swimmers, because of the demanding
28 and time intensive training schedule, you're limited to only a handful of hours each day to take

1 class, many swimmers choose majors that happen to offer classes in this small window. There
2 are many majors that swimmers aren't able to choose because they're unable to get the required
3 classes into their schedule in time for graduation. If cut, many of these swimmers may take a
4 pause from their academics along with their sport, to regroup, and maybe pick back up at a later
5 time.

6 9. I don't think sports should have a roster limit as a result of other sports monetary
7 success. This undermines the principle of NCAA sports; fairness, equal support for all sports,
8 giving equal opportunity to compete in all sports. This ruling is taking this away, with this ruling,
9 there's a loss of opportunity for people to compete in college sports. The roster cuts in D1 trickle
10 down to D2, to D3 and below, limiting the opportunity for all athletes at all levels in college
11 sports. I hope that the current roster sizes can remain without these drastically reduced limits,
12 which negatively impacts school spirit within athletic departments around the country. Just
13 because sports don't make money doesn't mean they shouldn't exist, cutting the roster weakens
14 the pipeline of American Olympic level athletes, without having college programs as training
15 grounds for athletes to dominate on a national stage, you hurt American sports. You hurt people
16 who want to get a degree while competing at a high level in their sport, people who want to setup
17 their future career path to contribute to society once their athletic career ends, cutting out people
18 who are good at their sport who need the athletic aid to attend college who wouldn't be able to
19 afford college without the aid. Many Olympians emerge from NCAA programs; limiting roster
20 sizes in these sports hurts American sports dominance in the Olympics. There's alot of
21 community in these sports, club teams in and around college campuses bring an extra community
22 of support and fundraising to campus life, they help build spirit and engage the alumni with the
23 school and athletic department, further extending the school's reach and legacy. Losing a spot,
24 due to no fault of your own, for something you were guaranteed is devastating. If you were
25 guaranteed something, I believe you should be guaranteed it, and I believe authority and
26 lawmakers should ensure those guarantees are met.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Chapel Hill, NC

January 28, 2025

Signed by:

Reid Miller

0A2BBED330C14C3

Reid Miller

NCAA ECID No. 1905586465

133 West Franklin St. #438

Chapel Hill, NC 27516

Jacob Modleski
21121 Carrigan Crossing
Noblesville, IN 46062

January 12, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Jacob Modleski. I am a current Division I athlete at the University of Notre Dame and my NCAA ECID number is 2198284462. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Jacob Modleski

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF JACOB MODLESKI

9 I, Jacob Modleski, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a sophomore and golfer at the University of Notre Dame. I am a member of
11 the Injunctive Relief Settlement Class and object on behalf of the class.

12 2. Notre Dame has been my home for the past year and a half. I've built
13 relationships with teammates, coaches, and friends that will undoubtedly last me a lifetime.
14 Additionally, I've developed into an elite athlete, but more importantly a better young man.

15 3. I started playing golf when I was three years old, but I didn't start playing at the
16 highest competitive level until my sophomore year of high school. By the end of my junior year
17 of high school, I had compiled a very respectable resume, but I was nowhere near a fully
18 developed player.

19 4. Despite this, Notre Dame took a chance on me. I wasn't a nationally touted
20 recruit. I wasn't on every school's top list of stars. I had plenty of natural talent, sure, but I was
21 a 140-pound Indiana kid who needed maturing as both a player and a person. Coach Handrigan
22 and Coach Zedrick saw my potential. Not all coaches did.

23 5. This story is common. There are hundreds, if not thousands, of athletes like me
24 that coaches take chances on. In fact, it is almost every recruit. Yes, some prodigies are bound
25 to find immediate success from high school to the professional level in a few short years, barring
26 injuries. But predicting the future of high school athletes is nearly impossible.

27 6. When I first stepped foot on campus at Notre Dame, I needed physical
28 development on and off the golf course, growth as a student in adapting to the difficult academic

1 environment that Notre Dame offers, and an understanding of how to develop my character so
2 that I am closer to the type of person I strive to be.

3 7. All of these things take time. Lots of time. In the past year and a half, with
4 unwavering support from my coaches and my teammates, I have made strides forward in my
5 physical golf ability but, more importantly, in becoming a better person.

6 8. The proposed changes to roster sizes across NCAA sports limit students'
7 opportunities for this same development for no reason. I understand the call for equality across
8 the entire landscape of collegiate sports, but fairness cannot come from picking and choosing
9 who has access to these opportunities.

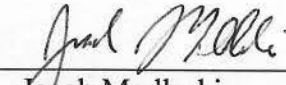
10 9. Further, these changes force coaches into impossible situations. Instead of
11 focusing on plans for development and growth, coaches are forced to decide who to keep and
12 who must go. That's not what coaches signed up for, and that's certainly not what hundreds of
13 coaches have pledged to recruits and players over the past four years. A coach's most valuable
14 assets are honesty and integrity, and the current settlement as it stands undermines both of those
15 in the most painful way possible for a coaching staff.

16 10. I also do not want to see my hardworking teammates cut because of these limits.
17 Every team member is valuable and each one of my teammates pushes me to be a better person
18 and a better player—regardless of their scholarship status or their ranking on the team. Everyone
19 on a team contributes to the team culture and to a team's success.

20 11. I ask for at least a grace period to extend a chance to play college sports to those
21 who were promised an opportunity. Kids spend their entire lives to have a chance to play
22 Division I sports, and to be denied that opportunity because of this settlement—which is out of
23 their control—simply isn't right. There should be at least a two-year grace period to allow the
24 transition towards smaller teams and to allow teams to maintain the cultures that they have spent
25 decades cultivating.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Dated: Notre Dame, Indiana
3 January 12, 2025


4 Jacob Modleski
5 NCAA ECID No. 2198284462
6 21121 Carrigan Crossing
7 Noblesville, IN 46062

Kalee Verd
5232 12th Ave NE
Seattle, WA 98105

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Kalee Verd. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 2309116282. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Kalee Verd

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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8 **DECLARATION OF KALEE VERD**

9 I, Kalee Verd, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a sophomore at the University of Washington and a walk-on athlete on the
11 NCAA Division I women's rowing team. I am a member of the Injunctive Relief Settlement
12 Class and object both individually and on behalf of the class.

13 2. I joined the Washington rowing team as a freshmen new to college with no
14 expectation of making the roster, but it has been a life-changing experience so far. Rowing has
15 shaped me in ways I never imagined, and I can confidently say that this program of strong,
16 amazing women has profoundly impacted my life. I cannot imagine where I'd be today without
17 this opportunity, and I don't think I'd be quite as confident or driven as I am now without it.

18 3. I am writing to express my concerns about the NCAA's proposed implementation
19 of a 68-athlete roster cap for women's rowing, which is set to take effect in the 2025–26
20 academic year due to the *House v. NCAA* settlement. While I understand that the NCAA has
21 made strides in increasing roster spots and scholarships for some sports, I am concerned that this
22 new cap will severely limit opportunities for walk-on athletes like myself and negatively impact
23 the growth of women's rowing programs.

24 4. When I first joined the team, I had no scholarship or guaranteed spot on the roster.
25 I simply showed up, worked hard, and gave everything I had, and I was lucky enough to earn a
26 place. For walk-on athletes, the opportunity to be part of a team is often the key to our athletic
27 journey. The chance to prove ourselves without the pressure of scholarship status is invaluable.
28 If the roster cap were in place when I walked on, there's a significant chance I wouldn't have

1 had the chance to prove myself or make the team. The new cap could severely limit the number
2 of walk-ons, reducing the diversity and depth of athletes who can contribute to their teams.

3 5. A larger roster allows for more opportunities for athletes, regardless of their
4 starting point. It ensures that walk-ons have a chance to develop their skills and earn a spot, and
5 helps build the supportive, inclusive community that is essential to a team's success. It's not
6 just about the athletes on the roster today, it's about creating opportunities for the athletes of
7 tomorrow.

8 6. While the settlement may provide more scholarship opportunities and allow
9 Division I schools to share athletic department revenues with athletes, the roster limits will still
10 create unnecessary barriers for those of us who don't initially have a scholarship. The focus on
11 increasing scholarship numbers is positive, but it's equally important to ensure that walk-on
12 athletes are not left out. The roster cap could lead to the exclusion of many athletes who are
13 ready to contribute and may not be on scholarship, but are eager to prove their worth.

14 7. The team culture in women's rowing is everything. It's about collaboration,
15 camaraderie, and lifting each other up. Without the opportunity to be part of a larger team, I fear
16 that many athletes, especially walk-ons, will miss out on the chance to experience this dynamic.
17 For many of us, being part of a team like this goes beyond just the sport, it's about the friendships,
18 the life lessons, and the support system that comes with it. It's a community where every athlete,
19 no matter their scholarship status, has a chance to grow and make an impact.

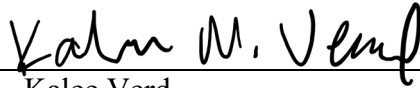
20 8. If the settlement moves forward with this 68-athlete roster cap, I am concerned
21 that we will lose these opportunities for future athletes. This policy may limit the growth of
22 women's rowing and prevent other athletes like myself from having the same transformative
23 experience I've had. I strongly urge the Court to reconsider this cap and recognize the
24 importance of fostering inclusion and opportunity for all student-athletes, particularly for walk-
25 ons who bring a unique and valuable energy to their teams.

26 9. Thank you for your time and consideration. I hope the NCAA will continue to
27 support and expand the opportunities for women in collegiate sports, allowing programs like
28 ours to thrive and giving athletes like me the chance to become the best versions of ourselves.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Dated: Seattle, Washington

3 January 20, 2025



Kalee Verd

NCAA ECID No. 2309116282

5232 12th Ave NE

Seattle, WA 98105

Jackson Mueller

9136 Rigney Terrace
Glen Allen, VA 23060

January 29, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken,

My name is Jackson Mueller. I am a current Division I athlete at William & Mary; my NCAA ECID number is 2206582862. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,

Jackson Mueller

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF JACKSON MUELLER

I, Jackson Mueller, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a class of 2028 at William & Mary and am a member of the NCAA Division I Men's and Women's Swim Team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.


2. Our coaches have explained to us that roster limits, if implemented, will cause our team to incur and suffer from cuts of four of our teammates. We do not yet know if these will be athletes currently on our team, incoming freshmen, or a combination. We do not want this and feel we should not have to worry about losing teammates or have any concerns surrounding our own position on the team. Added stress does not help performance or team spirit. Nor will a limited roster benefit our team.

3. We function as a team in and out of the pool. We eat together, study together, relax together, and live together; we have strong mentoring systems on our team and pride ourselves on helping one another in and out of the pool; we are a tight, supportive group. We worked incredibly hard throughout high school in order to have this opportunity; we all want to remain on this team and at our school, together. We do not feel roster limits help our team or our sport, but they will negatively impact those who are cut and our team at large.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Williamsburg, VA

January 29, 2025

Signed by:


 Jackson Mueller
 NCAA ECID No. 2206582862
 9136 Rigney Terrace
 Glen Allen, VA 23060

Leah Nash
4757 35th Ave NE,
Seattle WA 98105

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Leah Nash. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 2107283083. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Leah Nash

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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8 **DECLARATION OF LEAH NASH**

9 I, Leah Nash, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a senior at the University of Washington and am a member of the NCAA
11 Division women's rowing team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 2. I learned about the new roster limits recently from my head coach, who explained
14 that our cap, as of December 2025, would be 68 athletes, down from our current number of 103.
15 This would mean that a huge percentage of our team and athletes would face the risk of not being
16 on the roster after next fall. People who haven't been able to have enough time to develop as
17 rowers by next fall will not be able to compete at the University of Washington any longer.

18 3. I was deeply hurt in hearing this new information, as I began my rowing career
19 here at the UW as a walk-on my freshman year. It took over two years to develop into the athlete
20 I am today, at the top of the team as one of the fastest rowers. If there had been a roster cap in
21 place in my first two years on this team, I would have been an individual that was cut from the
22 team. I would not have become a PAC-12 Conference Champion and NCAA Runner-Up in the
23 Spring of 2023.

24 4. If I am cut from the team, I will lose my financial aid, sense of food security,
25 medical insurance, my community and family, and opportunity to further develop my rowing
26 with the hopes of rowing at the national and Olympic level.

27 5. As a result of roster limits, I am facing the possibility of not being able to graduate
28 and finish school at the University of Washington. I would not be able to afford tuition, housing,

1 and food if I were to be cut from the team.

2 6. I strongly object to the new roster limits that are being imposed. When I first
3 joined this team, I had just left my family and my life and moved across the country to Seattle
4 to start school in hopes of creating a better life. Having the opportunity to try-out for the rowing
5 team and find my community through this sport quite literally has saved my life, which was
6 threatened both physically and mentally at the start of my college career. Earning a scholarship
7 helped allow me to continue my education and not be faced with extreme financial burden as a
8 young adult.

9 I declare under penalty of perjury that the foregoing is true and correct.

10 Dated: Seattle, WA

11 January 26, 2025



Leah Nash
NCAA ECID No. 2107283083
4757 35th Ave NE
Seattle, WA 98105

Joshua Noll
3423 W. Brenwick Dr.,
Peoria, IL, 61614, United States

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Joshua Noll. I am a current Division I athlete at Auburn University and my NCAA ECID number is 2105176455. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Joshua Noll

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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8 **DECLARATION OF JOSHUA NOLL**

9 I, Joshua Noll, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a sophomore at Auburn University and a member of the NCAA Division I
11 Men's Swim and Dive team. I am a member of the Injunctive Relief Settlement Class and object
12 both individually and on behalf of the class.

13 2. I started swimming when I was five years old and started excelling in the sport
14 by middle school. So, I started thinking about swimming in college during middle school, when
15 my older siblings went to college to swim. There were ups and downs, but I continued to work
16 through the global pandemic to swim in college. After a rough junior year of high school, I even
17 moved away from my parents and lived with my cousin three hours away from home to have a
18 better opportunity with a better club team. That led to a great senior year of high school and kept
19 up good momentum into college.

20 3. I was a Junior National qualifier in multiple events along with being a Scholastic
21 All American for three years in a row in high school. I also still hold multiple records for both
22 club teams that I swam for.

23 4. I was honored to be recruited by roughly thirty different Division I schools. After
24 talking with multiple coaches, I narrowed it down to five official visits and one unofficial visit.
25 Five out of those six visits were to SEC schools as I wanted to move further south a little bit than
26 my home in Illinois and cousins in Missouri. I wanted a team that felt like a family, and I found
27 that when I visited Auburn University. I chose Auburn because of the team being so close knit
28 and the campus feeling like home as soon as I got there for my visit. When I signed with Auburn,

1 I was promised an athletic scholarship along with the full Alston benefits for the four years of
2 my eligibility. I also received an academic scholarship to attend Auburn University. I turned
3 down a few other offers to attend Auburn because of the bond with my recruiting class along
4 with the team environment.

5 5. I heard about roster limits through a SwimSwam article that was posted on
6 Instagram. Our coaches haven't directly addressed the lawsuit; however, they have talked about
7 impending roster cuts. We haven't been told who will be cut or retained, but roughly half the
8 team will be affected along with some incoming freshmen.

9 6. This has been taking a mental toll on both me and some of my teammates in a
10 negative way. It's created a lot of stress and fear of the unknown while we also try to have fun
11 and perform our best without thinking about our future, whether that is in Auburn or not. It adds
12 a lot on top of the pre-existing tough mental requirements for swimming and academics that I
13 deal with already. I am thinking and stressing about the limits more and more.

14 7. It is not entirely clear what I will lose if I am cut besides the athletic scholarship.
15 But I know I will lose the benefits of being an athlete at Auburn University such as free tutoring,
16 academic counseling, an athlete dining hall, and free entry to other sporting events on campus. I
17 have signed my lease for next year already too, which means I will have to find a potential
18 sublease to fill my spot. I will also lose the bond I have with my teammates and coaches that I
19 created through my visit when I was in high school and while on the team the past two years.

20 8. Due to roster limits, I am considering multiple avenues such as entering the
21 transfer portal and trying to find a spot on another team or staying here at Auburn University and
22 earning my degree while watching my teammates continue to compete. If I transfer, I am not
23 sure if all my course credits transfer which might make me take another semester to graduate.

24 9. With the SEC Men's Swim and Dive team roster limit going down to 22, it
25 doesn't allow room for development or mistakes or injuries as all 22 would be on the conference
26 championship team. It also makes it easier for foreigners who might be older and have already
27 developed to make the team compared to a high school aged American.

28 10. These roster limits don't make any sense and you should not approve them.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Auburn/Lee, Alabama

January 28, 2025

Signed by:

Joshua Noll

Joshua Noll

NCAA ECID No. 2105176455

3423 W. Brenwick Dr., Peoria, IL

61614, United States

Grayson Nye
3308 Langston Circle
Apex, NC 27539

January 20, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Grayson Nye. I am a current Division I student athlete at the University of Tennessee and my NCAA ECID number is 2111371952. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2024.

Sincerely,


Grayson Nye

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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8 **DECLARATION OF GRAYSON NYE**

9 I, Grayson Nye, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman at the University of Tennessee. I am a member of the University
11 of Tennessee's Division I men's swim team and thus I am a member of the Injunctive Relief
12 Class. I object individually and on behalf of the class.

13 2. I started swimming at an early age and have put in countless hours into improving
14 as a swimmer. In high school, I was a three-time North Carolina swimming state champion.
15 This past summer, I qualified for the opportunity to compete in the Olympic Trials in
16 Indianapolis, Indiana. While I did not ultimately earn a spot on the team U.S. men's swim team
17 for the Olympics, I was honored to have a chance to compete for a spot in Paris.

18 3. I started my recruitment process in the sophomore year of high school. My strong
19 high school swimming record led to my placement as the sixth-ranked high school recruit in
20 North Carolina and a top 100 recruit in the nation. As a result, I received strong interest from a
21 number of Division I programs. I took visits at the University of Kentucky, Auburn University,
22 the University of Alabama, the University of Southern California, and the University of
23 Michigan. After considering all of my options, I eventually committed to the University of
24 Tennessee late in the fall of my senior year. I loved my interactions with the coaching staff and
25 the competitive culture of the team.

26 4. The roster limits issue first came onto my radar when I arrived on campus for
27 summer training. It was not until November 2024 that I learned how they would affect me and
28 my team. Our coaches sat us down and let us know that they would be forced to cut a certain

1 number of student athletes at the end of the year because of the roster limits. We were told that
2 we would have until after the last meet in March to compete for a spot on the team. Although
3 no cuts have been made yet, the coaches made clear to us that they will have to make cuts because
4 of the roster limits. There is a lot of uncertainty amongst my teammates as to what the future
5 will hold for our collegiate athletic careers.

6 5. The fallout from the impending cuts has caused considerable anxiety for me and
7 many of my teammates. The first year as a college swimmer is a huge transition that has required
8 me to quickly adapt to new schedules, coaching styles, and training methods. Despite the
9 transition, I felt as though I was continuing to improve as a swimmer.

10 6. I have barely had the opportunity to show my coaches my level of competition
11 and ability to improve. I worry that developing swimmers like me will be the first ones cut from
12 rosters, despite oftentimes being the hardest working swimmers on the team.

13 7. I have worked extremely hard and have earned the opportunity to compete at the
14 collegiate level. Now, for reasons entirely out of my control, I could lose my spot before the end
15 of the season, and without a full opportunity to prove myself. I know that there are many other
16 swimmers, and student athletes in general, who feel the same.

17 8. The cuts by the roster limits could cause significant upheavals to my personal life
18 as well. I have had to put my life on hold in a lot of ways because of the roster limits. For
19 example, I live with some of my teammates, and we are no longer in a position to sign a lease
20 for the next school year because we do not know how many of us will be transferring to other
21 schools because of cuts.

22 9. My social life is also bound in many ways to the swim team. Our training
23 schedules are very busy and as a result we don't get many chances to interact with the rest of the
24 student body. Instead, I spend most of my time with my teammates, in spaces reserved for
25 student athletes like the athletic dining facilities. I am happy to do so, as my teammates have
26 become some of my closest friends. Being cut from the team would also mean losing some of
27 these important connections with my teammates, which I find incredibly disheartening.

1 10. A lot of my teammates, including some of the best swimmers on my team, are
2 against the roster limits. The cuts caused by the roster limits will fundamentally change the
3 fabric of our team for the worse and deeply impact team morale. At the very least, there should
4 be some sort of transitional phase to ease into the new roster limits. The abrupt change is simply
5 not fair to myself and my teammates.

6 I declare under penalty of perjury that the foregoing is true and correct.

7 Dated: Apex, North Carolina
8 January 20, 2025



Grayson Nye
NCAA ECID No. 2111371952
3308 Langston Circle
Apex, NC 27539

Liv Ormseth
P.O. Box 562
Vashon, WA 98070

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Liv Ormseth. I am a current Division I athlete at University of Washington and my NCAA ECID number is 2206596199. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Liv Ormseth

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF LIV ORMSETH

I, Liv Ormseth, hereby declare as follows pursuant to 28 U.S.C. §1746:

I am a Freshman at the University of Washington and am a member of the NCAA Division I Women’s Rowing team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

I have always had a love for competition, camaraderie, and exercise. Starting in Kindergarten, I played basketball, wrestling, soccer, track, lacrosse, baseball– wrestling, track, and lacrosse only lasted a few years, but the others continued through my childhood. At one point, my dream was to get to play basketball for Washington.

I began rowing in 8th grade at a club team on my small island. Throughout the next five years, I devoted countless hours of my time– six to seven practices per week, time per practice typically reaching three hours, if not more. I eventually had to give up soccer and basketball, as doing all of them was too much. The sport and the community changed who I am completely. I learned proper work ethic, leadership skills, accountability, and what it meant to be a good teammate, just to name a few. I developed self-confidence and respect for myself that I hadn’t found in anything else.

I got the opportunity to travel to competitions that hosted national and international competitions, such as the Head of the Charles in Boston, and Youth Nationals in Florida. I

1 worked so hard that as a Sophomore, I just barely missed qualifying for Nationals in the U19
2 single category— an age category that I was at the youngest end of, only being 16 years old.

3 In the June after my Sophomore year, as a result of overworking myself, I suffered a
4 back injury that sidelined me up until the May of my Junior year. The MRI showed a disc
5 bulge on my L5-S1. I was distraught, and found myself very depressed. I played basketball
6 again, but I just felt as though a part of me was missing. Despite believing that I would never
7 get to row again, a part of me held onto hope, and I worked hard in physical therapy, and by the
8 spring, I qualified for my club's top boat!

9 At the end of my Sophomore year, I had been communicating with college coaches, my
10 heart set on rowing in college. I had gone on a tour at Washington at the beginning of Junior
11 year, but all communications went silent on my end, as I didn't have the heart to tell coaches
12 what was going on. As that year ensued, I had given up on getting to row in college, thinking
13 that I was too late, and no coaches would want me due to my injury making me a liability. That
14 spring, I received another email from Washington. They were still interested. This was my
15 opportunity.

16 Washington offered a spot on the team, but you had to work for it. Nothing is promised,
17 you earn your spot through hard work. I turned down acceptances at the nine other colleges I
18 was accepted to, some of them were painful to turn away. But I wanted to be a Husky. I feel
19 pride and gratitude every day that I get the opportunity to be a part of Washington Rowing.

20 About a week ago, we came together as a team to talk about the roster limits that would
21 be enacted next year. Our head coach, Yasmin Farooq, explained the situation in detail,
22 wanting us to have all the information we needed to make an informed decision of what we
23 wanted to do with our own future. Sitting in a room of 90-100 of my teammates, there was not
24 one person I could look at that hadn't become a part of my life that I didn't want to give up. We

1 push ourselves and each other every day; sometimes rowing can be miserable, cold, sopping
2 wet, or painful, but I still look forward to it every day. This is because I get to surround myself
3 with the most amazing people. In each of them, I can see qualities that I aspire to develop in
4 myself. This quarter, I've gotten the opportunity to be the Freshman representative on the
5 leadership board for the rowing team. This means I've gotten to attend meetings with the
6 coaching staff and the representative for each of the grades above me to help maintain the
7 functionality of the team, and solve problems in the boathouse. This has been yet another
8 chance for me to learn from role models that will help me become a better person. The team
9 culture that has been fostered would be diminished by nearly half if the roster is capped at 68,
10 forcing coaches to cut so many of us.

11 Knowing that we may only have about half of our current capacity next year, every day
12 of practice feels like a test. Pressure feels heightened, and we search for hidden meaning in
13 every lineup and message from coaches to indicate whether we will be kept on the team next
14 year.

15 Being part of Washington Athletics makes getting an education far more manageable
16 and affordable for me. I get access to free meals most of the week, a center for academics that
17 includes tutors, priority registration, and an advisor, and resources for medical, nutritional, and
18 mental help. I also get opportunities to attend career workshops, and connections to a legacy of
19 Washington Rowers. In return, I commit myself to working hard every day, putting my best
20 foot forward at each practice, and trying to make my team a better place when I'm there, and
21 for the future generations. I won't only lose these opportunities and resources; if rowing is
22 taken away, I fear that I will return to the way I felt when I had to step away from it for a year
23 in high school. Rowing houses my support network and my closest friends, it gives me self
24 respect and confidence, and it structures my life and pushes me to be my best self.


1 I am still developing as an athlete. I come from a smaller team where I was always at
2 the top, and had nobody to compare myself to and to push me. Surrounded by incredibly strong
3 and hard-working teammates at Washington, I surprise myself on each test. I am hitting times
4 that I've never seen before. I need more time to develop into the athlete I want to believe I can
5 one day be. Next year, I might not be at my full capacity, and if the roster limits are slashed in
6 half, I may never reach it. I love the state of Washington, I've grown up here my whole life.
7 The offer of in-state tuition, and proximity to my family is very important to me. If I am cut
8 next year, I would want to continue rowing at the competitive level I get at Washington, but I
9 don't want to have to sacrifice the education and connections I have made here. There doesn't
10 seem to be a good solution to that decision, and the likelihood of being put in that position is
11 greatly heightened by a roster limit of 68.

12 I hope that the roster limits can be reconsidered as being cut from the team would
13 greatly impact the lives of so many— myself, and my close friends and teammates, as well as
14 people across the country who are in the same position on their rowing team. Rowing is
15 undoubtedly life-changing, and rewards those who are willing to work hard and be good
16 teammates, and it feels wrong to prevent athletes from being able to do that on the basis of a
17 system that is fully able to change.

18 I declare under penalty of perjury that the foregoing is true and correct.

19 Dated: Seattle, WA

20 January 26, 2025

Signed by:

2A3171A5E1C44AF...

21 Liv Ormseth
22 NCAA ECID No. 2206596199
23 P.O. Box 562
24 Vashon, WA 98070

Veronika Owen

2619 Puritan Court
Herndon, VA 20171

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken,

My name is Veronika Owen. I am a current Division I athlete at William & Mary; my NCAA ECID number is 2209661624. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,

Veronika Owen

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF VERONIKA OWEN**

9 I, Veronika Owen, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman at the College of William & Mary and am a member of the
11 NCAA Division I women's swim team. I am a member of the Injunctive Relief Settlement Class
12 and object both individually and on behalf of the class.

13 2. I trained nine times a week, 15 hours a week, for six years to gain enough
14 experience and training to have the chance to be a Division I college athlete. The rigorous
15 training with swimming required it to remain my top priority throughout high school, and as
16 such, I sacrificed numerous academic and social opportunities in order to maintain optimal
17 training or compete. I was unable to commit myself to the full International Baccalaureate
18 diploma experience because I understood I had to keep being able to swim constantly during my
19 junior and senior years to realize my goal of competing at the Division I level. Moreover, I was
20 unable to join debate club, book club, or creative writing club because of after school practices
21 and drylands. In my junior and most of my senior year, I was unable to attend Model UN
22 conferences because of conflicts with major meets. In addition, I consistently missed other social
23 events such as attending high school sports games, dances, honors societies meetings and other
24 activities.

25 3. I was recruited to William & Mary because I demonstrated the same principles
26 of the athletes that represent the school's program. In high school, I showcased my competitive
27 skill and competed at multiple national meets including Winter Junior Nationals, TYR Pro
28 Series, and Futures. Furthermore, I demonstrated academic excellence because I was a part of

1 the 2022 Scholastic All American Team and 2022-2023 PVS Scholar Athletes. Lastly, I'm a
2 two time record breaker for my high school.

3 4. During my recruiting process, I knew that I was looking for an academically
4 rigorous, mid-sized school at a mid-major Division I school. When I reached out to the William
5 & Mary coaches, I realized with enthusiasm this was the place I wanted to be, and the coaches
6 reciprocated that enthusiasm for me. The coaching staff was eager to introduce me to the team
7 and its kind, welcoming dynamic. After a few months of communicating, I was offered a spot
8 on the team which I graciously accepted. I was so grateful I had found the perfect school for me
9 to pursue my athletic and academic dreams for the next four years. I had considered other
10 schools, but I was drawn to the unique cohesiveness and bond the team had, and I knew there
11 was no place I'd rather be to compete, learn and grow alongside other incredible athletes and
12 people.

13 5. My coach told us about the roster cuts at a team meeting a few months ago when
14 there was more uncertainty. At the time, no cuts had occurred. A few months later, our head
15 coach announced that if the roster limits were to go into effect, four female athletes would be cut
16 from the team next year. It's uncertain if the incoming class, current teammates or a combination
17 of both will be cut, but as of right now, the cuts are expected. Swimming is such a representative
18 sport of outstanding female athletes, and to have four women cut from the team would be
19 detrimental to our program. Since William & Mary does not have a dive team, every single
20 swimmer on our team is absolutely necessary to swim and score points at meets given our
21 automatic 32-point disadvantage. The roster cuts would not only gravely affect the team's
22 morale; it would make the point difference even harder to make up in dual and championship
23 meets.

24 6. These propositions for roster cuts have taken an enormous mental toll on myself
25 and my teammates. Swimming is an incredibly difficult sport with intense aerobic and
26 anaerobic, muscular, and mental strength to perform at the Division I level. That strength comes
27 from our teammates and our comradery in practice and meets, lifting each other up. However,
28 these roster cuts have induced anxiety in the team as to who will and will not be swimming next

1 year. I have had to begin taking anti-anxiety medication because the dread of losing my teammates or my spot has induced such immense stress that it has gravely impacted my performance this season.

7. Swimming has an enormous influence in my life and is a large part of who I am. It's how I take a break from academics and spend time with my best friends. If I get cut from the team, I will lose that piece of me. I will lose out on tutoring services, class priority registration, and other academic resources. I will not be able to be as close with my friends as I am now without seeing them every day at lift and practice. I will have to go through the rest of college knowing that I should have – and would have – been there alongside them but that I couldn't because of something that I couldn't control or stop.

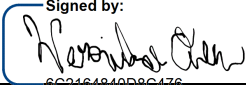
8. If I am cut from the team, my athletic career will have to end. Because William & Mary has one of the best International Relations programs in the country, no other swim program that could offer me a spot would be able to offer the classes, resources, and professors I require to be successful in the future.

9. I implore the court to reconsider the roster limits. There is no good to come of them as it only damages the team dynamic and individual members' mental health. Denying young people the opportunity to pursue their dreams because of roster limits imposed by the lawsuit is completely abhorrent, and I would urge the court to realize the immense toll it would take on not just those that are cut from my team, but a generation of student-athletes for years to come.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Williamsburg, Virginia

January 28, 2025

Signed by:

6C2164840D8C476...
Veronika Owen
NCAA ECID No. 2209661624
2619 Puritan Court
Herndon, VA 20171

Sophia Park
1006 Kearney Drive,
North Brunswick, NJ, 08902

January 21, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Sophia Park. I am a current Division I athlete at Liberty University and my NCAA ECID number is 1903446698. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,

 /s/ Sophia Park

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF SOPHIA PARK**

9 I, Sophia Park, hereby declare as follows pursuant to 28 U.S.C. §1746:

10 1. I am a sophomore and a member of the NCAA Division I track and cross
11 country teams at Liberty University. I am thus a member of the Injunctive Relief Settlement
12 Class and object to the settlement on behalf of myself and the class.

13 2. Running has always been a passion of mine. In high school, I was part of three
14 New Jersey state championship teams in cross country and track and field, and I set school
15 records in the 1600, 4x800, and distance medley relay.

16 3. I chose to attend Liberty University and joined the team as a walk-on. I am not
17 on an athletic scholarship, and work very hard to contribute to the team.

18 4. My freshman year was filled with memorable experiences. During the 2024
19 outdoor track season, I achieved personal bests in the steeplechase (11:36.49), the 1500m
20 (4:44.11), and the 5K (18:11.51). I competed in the C-USA steeplechase final, where I placed
21 fifth, and was named the Most Improved Team Member by my coaches in the fall of 2024 for
22 Cross Country.

23 5. I was also recognized for my academic efforts, earning a C-USA
24 Commissioner's Academic Medal and a spot on the C-USA Commissioner's Honor Roll.
Balancing a rigorous training schedule with academics has been challenging, but I feel as

1 though I was able to strike a balance and have been able to flourish in both academics and
2 athletics here at Liberty.

3 6. I first heard about the settlement in this lawsuit and the roster limits last fall.
4 Our coaches have not given us many details about how the roster limits will impact our team,
5 and the uncertainty has been very stressful. I know that there could be significant cuts to the
6 team, but I do not know whether or not I will be cut from the team.

7 7. The uncertainty has been stressful. The possibility of losing my place on the
8 roster has made it difficult to plan for my future at Liberty University. Roster limits
9 disproportionately affect athletes like me, developmental athletes who may not have been top
10 performers in high school but have shown improvement at the collegiate level. Liberty has a
11 strong emphasis on developmental athletes like me, and the coaching staff has been very
12 supportive in making sure that I have the time and training that I need to be able to compete at
13 the collegiate level.

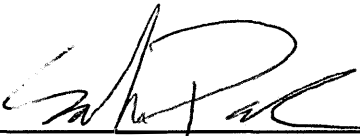
14 8. If I am cut, I will lose access to team resources, including coaching, athletic
15 facilities, and structured training. These resources have been critical to my personal growth
16 and as a runner and student.

17 9. The proposed roster limits undermine the mission of collegiate athletics by
18 eliminating opportunities for walk-on student athletes like me. With roster limits in place,
19 teams will no longer have the room on their rosters to accommodate walk-on athletes who may
20 not have had the same exposure to the sport and training before college, or who simply may
21 need a little extra time to develop in order to be able to compete at the next level.

22 10. My time at Liberty has been defined by the opportunities to compete, improve,
23 and represent my school. Losing those opportunities would be extremely disheartening. I
24 object to the roster limits in the proposed settlement because of the harm they will cause to

1 countless student-athletes.

2
3 Dated: Lynchburg, Virginia
4 January 22, 2025


Sophia Park
NCAA ECID No. 1903446698
1006 Kearney Drive
North Brunswick, NJ, 08902

Elizabeth Peery
23110 NW 11th Ave,
Ridgefield, WA 98642

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Elizabeth Peery. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 2301757867. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Elizabeth Peery

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF ELIZABETH PEERY**

9 I, Elizabeth Peery, hereby declare as follows pursuant to 28 U.S.C. §1746:

10 1. I am a 2028 at the University of Washington and am a member of the NCAA
11 Division I women's rowing team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 2. I have spent roughly 30 hours a week, every year since I was around 8 years
14 old, to get to the position to compete at the Division 1 level. Constant driving to practice.
15 Dedication of myself, my family, friends, and all others who supported me. Being a student
16 athlete is not for the weak, as many might know, however it takes a village to get to compete at
17 a D1 level.

18 3. 5 State Championships appearances, 3 National Championship appearances,
19 several qualifiers in different sports, tournaments every weekend of the summer/fall, and last
20 but not least the life lessons I have learned on the journey through my sports. All the
21 medals/awards I have won, were not easily attained. One must work tirelessly to earn the
22 opportunity to compete at the highest level. To do so, you lose countless friendships,
23 opportunities (outside of sports), parties, and so on. To be an athlete at this level, you sacrifice
24 "fun," for more time on the court, field, and water.

4. My recruiting experience was quite normal. The stress of emailing a coach. The

1 pressure of choosing the right college that will inevitably change the trajectory of your future.
2 The endless pain that haunts you when your dream school turns you down. For me, my main
3 recruiting was for softball. I spent 4 years of my life dedicated to writing emails, talking to
4 coaches, research, and practicing until I dropped to make sure I was good enough to compete at
5 the highest level. Near the beginning of my senior year, I received an email from coach Allie
6 Lohrenz (hometown husky recruiting coordinator) from UW rowing. I responded, visited UW,
7 and ended up ending my softball career to try something new, rowing. When I made the
8 decision, I was told that if I continued to work hard throughout college, there would be an
9 opportunity for scholarship money. While this was not the main reason for committing, it gave
10 me something to look forward to.

11 5. For the University of Washington team specifically, they recruit several
12 walk-ons. Both before the school year and during. Walk-ons being someone who has never
13 competed or trained in the sport of rowing. For my freshman year, we had almost 12 walk-ons
14 try-out for the chance to be a Woman of Washington Rower. With this being said, we needed
15 an extensive amount of training to learn how to row, the proper mechanics, the different parts
16 of the boat, and make friendships with both the coaches and teammates. As the potential roster
17 cap states, the roster has to be finalized no later than December 1st. This is nowhere near
18 enough time to train, grow both in strength and mindset, and be able to compete with others
19 who have been working at rowing for the past 3-4 years. At Washington, it is shown that
20 walk-ons can become Olympians and National Champions given the proper time and growth it
21 requires to become a strong athlete at the highest level. My teammates and I were told this past
22 week at our team meeting that there was going to be a roster cap set in place for the upcoming
23 season. As a team with a large roster, almost double what the cap is set to be placed at, the
24 freshman were quite concerned. Starting off the season with around 60 freshmen and roughly

1 58 varsity members, we were nervous about the large roster however we were reassured that
2 this was for a reason and that we will only grow stronger as a team. As I, and teammates have
3 learned, the larger the team, the more we grow.

4 6. This is unfortunately taking a large toll on both my own, and my teammates'
5 state of mind. As we go to practice, we try and over-compete with each other to stay for the
6 upcoming season. This hurts our relationships and does not build a good team aura.

7 7. As many of us have trained for years, we are bound to have a set routine.
8 Specifically for injuries, meals, practices, and so on. For injuries, whether they are past,
9 present, or reoccurring, athletes who have trained their whole life need the best help they can
10 receive medical care from doctors who are very familiar with these specific injuries. For meal
11 plans, as a student athlete who is given snacks, lunch and dinner 5 times a week, and food
12 support at all times, it is a very large adjustment to go into something that you are not used to.
13 This can cause malnutrition and a lot of money that the athletes will be losing out of pocket to
14 provide their own food. Practices have been built into athletes' schedules since they were very
15 young and it is a big change when they don't have something to attend to, workout, or build
16 time back in their schedule. This causes depression, athletes can lose their personality, and
17 many other scary mental illnesses that come along with being dropped from a sport.

18 8. As for the roster cap, I am a walk-on freshman who is still learning how to row,
19 the terminology, and so much more that comes along with the sport. From a team with a large
20 roster, my position on the team is not guaranteed as the roster cap closes in. This is very
21 devastating as I came to the school with the idea that I was going to have a built in community,
22 schedule, meal plan, and personal trainer. As many know, the University of Washington is quite
23 expensive, so for my family, paying for all of the extra things that sports give me will bring
24 quite a toll. I am afraid that even though the University of Washington is my dream school and

1 I am here for a specific major that I intend to complete, I will have to transfer to another school
2 to be able to afford the price that such a school requests. Something I never thought I would
3 have to do.

4 9. If I have any opportunity to suggest another option, other than a roster cap, I
5 would love to do so. A roster cap would mean cutting the life and soul out of thousands of
6 athletes who have worked their entire life for the opportunity to compete at the next level. I
7 plead that roster caps are not implemented and another option is reviewed. For myself,
8 teammates, and future D1 athletes, I ask that you give us an opportunity to do what we worked
9 so hard to do. Thank you.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Dated: Seattle, Washington

12 January 26, 2025



Elizabeth Peery
NCAA ECID No. 2301757867
23110 NW 11th Ave,
Ridgefield, WA 98642

Alessandro Perez
712 Belmont Dr
Georgetown, TX 78626

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Alessandro Perez. I am a current Division I athlete at Texas A&M University and my NCAA ECID number is 2104158503. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,


/s/ Alessandro Perez

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF ALESSANDRO PEREZ

9 I, Alessandro Perez, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a sophomore and a member of the NCAA Division I football team at Texas
11 A&M University. I am a member of the Injunctive Relief Settlement Class and object on behalf
12 of the class.

13 2. In high school, I was a four-sport athlete, competing in powerlifting, track,
14 wrestling, and football. I put in countless hours training every day to improve as an athlete. My
15 efforts paid off. I was ranked as a top five defensive lineman in the state of Texas and led my
16 high school in sacks. I was also a state qualifier in wrestling and have earned several more
17 accolades in track and powerlifting. I took my academics seriously as well, and received
18 academic honors in high school.

19 3. Two months prior to graduation, I was contacted by the football recruiting staff
20 at Texas A&M. They invited me on campus visit and subsequently offered me preferred walk-
21 on status with the team. I was ecstatic to have the opportunity to continue playing the sport I
22 love and competing at the highest level of collegiate football.

23 4. I redshirted my freshman year in order to maximize my development potential,
24 so I could compete for playing time in the future. My hard work earned me team accolades like
25 scout team player of the year nominee and if I continued to develop as a player, I would likely
26 be getting playing time next season. Unfortunately, I recently suffered a devastating knee injury
27 mid-season- this past October- tearing my ACL. Despite my injury post-surgery, I was still
28 determined to continue playing football. I have been diligent in my rehabilitation journey and

1 expect to make a full recovery before next season.

2 5. I first heard about the roster limits issue on social media at the beginning of my
3 sophomore year. Later in the season, we were told by our coaches that the roster limits would
4 result in cuts to the football team's roster. We were told by the coaches that the roster cuts would
5 disproportionately affect the walk-on student athletes like me. I was told that due to my injury,
6 and because of the number of transfer students coming in next season, that it was unlikely that I
7 would be able to retain my spot on the roster next season. Although a final decision has not yet
8 been made, it seems likely that I will be cut if the roster limits are approved.

9 6. Some of my teammates, who are also walk-on student athletes, have already been
10 cut in anticipation of the roster limits going into effect. There has been a lot of uncertainty and
11 panic amongst the walk-on athletes as we don't know whether we will be able to keep our roster
12 spots next season. Walk-ons like me are some of the hardest working athletes on the team. We
13 put in countless hours of training and study just for the chance to get any time on the field, and
14 this uncertainty puts our future at risk of being displaced with little to no time to plan for an
15 alternative.

16 7. Losing my spot on this team would be devastating to me. I've committed over a
17 decade of my young life to get to this point, sacrificing time with friends and family for grueling
18 workouts and training as often as three times a day. I was always happy to do so, because the
19 investment in myself was supposed to unlock opportunities to compete on the field and to be
20 part of a team. Now, I feel crushed and in a sense of panic over what to do next.

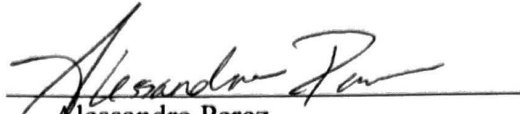
21 8. It seems that I will now have to either remain at Texas A&M and be forced to end
22 my collegiate football career entirely or risk leaving all my connections here to enter a highly
23 congested transfer portal while still in recovery. In the meantime, I will potentially be losing out
24 on benefits like access to the Texas A&M athletic facilities, supplemental food support, and my
25 tuition support annual scholarship for student-athletes. This decision, and the rushed timing
26 forced by both my injury and the roster limits, have caused great distress for me and my family.

27 9. The Texas A&M football program and home of the 12th man prides itself on the
28 opportunities it provides to walk-on athletes like myself. Our coaches consistently give walk-

1 on athletes the chance to prove their abilities on the field. The roster limits in this settlement
2 will put an end to that opportunity for hard-working student athletes like me. Allowing student
3 athletes to develop and giving them a chance to prove their talents on the field is the entire point
4 of collegiate athletics. The NCAA should be maximizing these opportunities, not stripping them
5 away from people.

6 I declare under penalty of perjury that the foregoing is true and correct.

7 Dated: College Station, Texas
8 January 28, 2025


Alessandro Perez
NCAA ECID No. 2104158503
712 Belmont Dr
Georgetown, TX 78626

Faith Perry

1007 Lafayette St
Williamsburg, VA 23185

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken,

My name is Faith Perry. I am a current Division I athlete at William & Mary; my NCAA ECID number is 2002804849. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,

Faith Perry

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF FAITH PERRY**

9 I, Faith Perry, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a Senior at William & Mary and am a member of the NCAA Division I
11 Men's and Women's Swim Team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.


13 2. Our coaches have explained to us that roster limits if implemented, will cause our
14 team to incur and suffer from cuts of four of our teammates. We do not yet know if these will be
15 athletes currently on our team, incoming freshmen, or a combination. We do not want this and
16 feel we should not have to worry about losing teammates or have any concerns surrounding our
17 own position on the team. Added stress does not help performance or team spirit. Nor will a
18 limited roster benefit our team.

19 3. We function as a team in and out of the pool. We eat together, study together,
20 relax together, and live together; we have strong mentoring systems on our team and pride
21 ourselves on helping one another in and out of the pool; we are a tight, supportive group. We
22 worked incredibly hard throughout high school in order to have this opportunity; we all want to
23 remain on this team and at our school, together. We do not feel roster limits help our team or our
24 sport, but they will negatively impact those who are cut and our team at large.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Williamsburg, VA

January 28, 2025

DocuSigned by:

 11B5DC208E9B426...
 Faith Perry
 NCAA ECID No. 2002804849
 1007 Laffayette St.
 Williamsburg, VA 23185

Matthew Prigmore
3947 Cascade Terrace
Weston, FL 33332

January 10, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Matthew Prigmore. I am a current Division I athlete at the University of Central Florida and my NCAA ECID number is 2107279753. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Matthew Prigmore

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF MATTHEW PRIGMORE**

9 I, Matthew Prigmore, hereby declare as follows, pursuant to 28 U.S.C. § 1746:

10 1. I am a sophomore at the University of Central Florida (“UCF”). I am a member
11 of the NCAA Division I football team and thus a member of the Injunctive Relief Class. I am
12 writing to oppose the roster limits, and my objection applies to that class.

13 2. Football has been central to my life since I began playing as a freshman in high
14 school. The game has shaped my identity, teaching me discipline, perseverance, and teamwork.
15 By my junior year, my efforts were recognized, and I received a preferred walk-on opportunity
16 at Florida Atlantic University. However, after the coaching staff at FAU was replaced, I sought
17 a program that was a better fit for me. UCF emerged as that program—offering not only a strong
18 football culture but also an exceptional academic environment. Accepting a preferred walk-on
19 position at UCF allowed me to pursue my dreams both on the field and in the classroom.

20 3. A preferred walk-on position on the football team provides a guaranteed roster
21 spot but does not include an athletic scholarship. Nevertheless, UCF has supported me with
22 academic tutoring, athletic gear, some meals, access to the athletic facilities, priority housing,
23 and priority class registration. This support system has been invaluable as I strive to balance the
24 rigorous demands of being a student-athlete.

25 4. During my first year at UCF, I redshirted in order to have more time to develop
26 as a football player. However, this year, just before Thanksgiving, I learned from our former
27 offensive line coach that the proposed settlement in this case would impose a limit on the roster
28 size for the UCF football team. I was shocked when I later confirmed this through social media

1 and saw widespread backlash from players and fans. This announcement has introduced
2 tremendous uncertainty into my future and that of my teammates.

3 5. The proposed roster limits would not only jeopardize my place on the team but
4 also fundamentally alter my college experience. Football is more than a game to me—it's a
5 defining part of who I am. If I were cut from the team, I'd face a difficult choice: either enter
6 the transfer portal to try to continue my football career elsewhere or give up the game altogether.

7 6. UCF's strong academics make it my preferred choice, but the thought of losing
8 my spot on the team is devastating. I also receive an in-state academic scholarship from Florida's
9 Bright Futures scholarship program which I would lose if I transferred out of state.

10 7. I committed to this program as a student-athlete prior to graduating high school.
11 I had other offers to various schools throughout the country; however, I accepted my dream offer
12 at UCF as a preferred walk-on. It seems unfair that this potential settlement could change my
13 trajectory. If given this information prior to accepting this offer, my plans would have been
14 different.

15 8. Walk-on athletes like me are among the hardest working members of any team.
16 We don't receive scholarships, stipends, or NIL compensation. Instead, we play for the love of
17 the game and the chance to contribute to something bigger than ourselves. Many walk-on
18 athletes excel academically because we rely on academic scholarships, which require us to
19 maintain high GPAs.

20 9. The student-athletes that will be disproportionately cut from their teams as a
21 result of these proposed roster limits will be walk-on athletes. The students that will be harmed
22 most are those of us who have overcome obstacles to earn our place on the roster. It eliminates
23 opportunities for athletes who embody the core values of perseverance and dedication.

24 10. Roster limits also pose practical challenges for football programs. Injuries are a
25 reality of the sport, and at any given time, about 10 players on our team are sidelined due to
26 injury. Reducing roster sizes increases the risk of overworking the remaining players, potentially
27 leading to more injuries. Smaller practice squads would also slow preparation for games,
28 harming the team's overall performance.

Nathan Quarterman
2115 East 18th Street, Unit B
Austin, TX 78702

January 29, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Nathan Quarterman. I am a current Division I athlete at the University of Texas and my NCAA ECID number is 1907641514. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Nathan Quarterman

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF NATHAN QUARTERMAN

I, Nathan Quarterman, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a senior at the University of Texas and, until December 2024, was a member of the NCAA Division I men's swim team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. I began swimming competitively at a young age and, during high school, became a fifteen-time Idaho state champion. I dedicated countless hours to training and competing, which earned me the opportunity to swim at the collegiate level. I have also been named a four-time conference academic All-American during my time at the University of Texas.

3. My journey to become a Division I swimmer required significant personal sacrifices, including missing social events and balancing rigorous training schedules with academic responsibilities. I have always taken pride in my role as a student-athlete.

4. I first learned about this lawsuit in the summer of 2024 and heard about the potential for roster limits. At the time, I did not fully understand the details or how the roster limits might affect me and my teammates.

5. In December 2024, our coach informed the team that if we did not meet certain time standards or qualify for the SEC championship roster, we would be cut from the team. The SEC roster is limited to 22 athletes, including divers, which means only 18 swimmers can compete. Unfortunately, I did not make the SEC roster and was informed that I would no longer be part of the team for the remainder of the season. This decision effectively ended my collegiate swimming career mid-season, as the season typically runs through March. I was allowed to

1 participate in the senior night meet, but only as a ceremonial acknowledgment. I will not be
2 permitted to continue training with the team.

3 6. My situation is somewhat unique, as I am eligible for an additional year of
4 competition due to a medical waiver. However, with the current roster limits, I do not believe I
5 will have the opportunity to swim for the University of Texas next year. This has left me
6 considering whether to transfer as a graduate student to another program, a decision complicated
7 by the uncertainty of finding a place to train and ensuring my academic credits will transfer.

8 7. The roster limits have caused significant stress and anxiety amongst me and my
9 teammates. Many of us have devoted years to achieving and maintaining this level of
10 performance, only to abruptly lose our roster spots without clear justification. This has
11 negatively impacted our mental health, and has been a major distraction from both our athletic
12 and academic pursuits.

13 8. Being cut from the team has disrupted my sense of identity and purpose as an
14 athlete and fractured the close bonds I shared with my teammates. Not just my own, but those of
15 the members of the team who are still currently swimming as well.

16 9. These arbitrary restrictions unfairly punish athletes who have worked tirelessly
17 to represent their schools and compete at the highest level. Losing these opportunities
18 undermines the principles of fairness and merit that should guide collegiate athletics.

19 I declare under penalty of perjury that the foregoing is true and correct.

20 Dated: Austin, Texas

21 January 29, 2025

DocuSigned by:



D1F6F499688B40A

Nathan Quarterman

NCAA ECID No. 1907641514

2115 East 18th Street, Unit B

Austin, TX 78702

Tyler Quarterman
3506 Speedway #302
Austin, TX 78705

January 21, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Tyler Quarterman. I am a current Division I athlete at the University of Texas and my NCAA ECID number is 2106218600. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2024.

Sincerely,

/s/ Tyler Quarterman

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF TYLER QUARTERMAN**

9 I, Tyler Quarterman, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman at the University of Texas, where, until January 2024, I was a
11 member of the men’s swim team. I am a member of the Injunctive Relief Settlement Class. I
12 object individually and on behalf of the class.

13 2. I have been swimming competitively since a young age. As a high school athlete,
14 I was an eight-time state champion in Idaho. This includes wins in multiple relays, the 100-yard
15 backstroke and 200-yard freestyle as a senior. I am also proud to have broken a state record in
16 the 200-yard medley relay. I was also a two-time Junior Nationals qualifier, and a finalist in
17 2024.

18 3. My high school accomplishments led to my ranking as the number one college
19 recruit in Idaho for the class of 2024. As a result, I received recruitment interest from a number
20 of Division I programs including the University of Kentucky, the University of Southern
21 California, and the University of Cincinnati.

22 4. Ultimately, I decided to attend the University of Texas. I’ve always had a strong
23 connection to the University of Texas due to our family history. My father swam for Texas in
24 the 80s and my brother was a senior on the swim team until quite recently. It has been my dream
25 to compete as a Longhorn for as long as I can remember.

26 5. I first heard about the settlement in this lawsuit prior to arriving on campus last
27 fall. Within a month of the semester beginning, my coach discussed the possibility of roster
28 limits leading to cuts with the team. The coaches did not get into specifics on the cuts, and so I

1 focused instead on what I could control: working hard at school and training hard in the pool.

2 6. Last month, however, our head coach called the whole team in for another
3 meeting. This time, he mentioned that due to the settlement moving forward, he would have to
4 make cuts because of the roster limits. He added that he would be making decisions after our
5 next swim meet. Despite performing well at our meet, four of my teammates and I were
6 informed that we no longer had a spot on the team. We were told that we could no longer even
7 practice with the team.

8 7. I was crushed by this news to say the least. I have been swimming my whole life,
9 and I have put in countless hours with the dream of competing at the collegiate level. Now, after
10 swimming in only four meets, that dream has abruptly ended. My family takes a lot of pride in
11 Texas swimming, and I wanted a chance to keep that tradition alive for all of us. I felt really
12 disheartened with the roster limits decision.

13 8. The most frustrating aspect of being cut from the team is that I feel like I did not
14 have an opportunity to show what I was capable of. I am a developing swimmer at the very
15 beginning of my collegiate athletic career, and I've improved a lot over the past year. Not having
16 the opportunity to continue to develop into the swimmer I could become has been incredibly
17 disheartening.

18 9. If I want to continue swimming at the collegiate level, I will likely have to transfer
19 out of state. Doing so would come at a considerable financial cost to myself and my family, as
20 I am currently paying in-state tuition at Texas. Transferring would mean losing all of the friends
21 I have made here at Texas, and I would have to build new relationships with coaches at a brand
22 new school. It would mean a total upheaval of a large part of my life.

23 10. There is no guarantee that I will even be able to secure a spot on another roster in
24 the transfer portal. I know that student athletes across the country are entering the transfer portal
25 now because of cuts being made by the prospect of roster limits. There will likely be many
26 student athletes competing for a reduced number of roster spots.

27 11. If I do stay at Texas, I would lose access to important benefits I was able to rely
28 on as a student athlete. I currently have access to athletic facilities on campus, such as the student

athlete dining hall, academic tutoring and advising. I also receive swimming gear, books for my classes, and a \$6,000 dollar per year stipend for student athletes. Covering the costs of these benefits on my own will be a significant financial burden for myself and my family.

12. I always thought that if I consistently put in the work in the pool, that I would at least have an opportunity to compete on race day. The cuts that have been made because of these roster limits throw this idea into question for myself and countless other student athletes. I have abruptly had my life turned upside down without any say in the matter. These roster limits should not be approved.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Austin, Texas

January 21, 2025

Signed by:

Tyler Quarterman

Tyler Quarterman

NCAA ECID No. 2106218600

3506 Speedway #302

Austin, TX 78705

Harrison Ranier
6110 Silver Eagle Way
Concord, NC 28027

January 30, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Harrison Ranier. I am a current Division I athlete at Auburn University and my NCAA ECID number is 2101997484. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Harrison Ranier

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF HARRISON RANIER

I, Harrison Ranier, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a sophomore at Auburn University and am a member of the NCAA Division I Men's Swimming & Diving team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. To have the chance of being a Division I college athlete, I practiced swim 12 hours per week plus 3 days of competition per month during middle school every night after school from 6:00-8:00 p.m. and on Saturday mornings, 12 months out of the year. In high school, I attended school from 7:15a.m.-2:15p.m. and practiced swim 28 hours per week plus 3 days of competition per month. During the week, I awoke at 4:30a.m., drove to practice 30 minutes away, practiced from 5:30a.m.-6:30a.m., drove to school for my academic day, then back to practice from 3:00-6:00 p.m. I ate meals in the car between practice and school and had no time for any activities during high school outside of classes and swim. I also had practice from 6:00am-9:00 a.m. every Saturday and Sunday. This practice schedule was active 12 months out of the year, with mandatory training trips and double practices (morning and evening) during the two weeks between Christmas and New Year's and the summer months. I also swam for my high school swim team which added four hours to my schedule each week during the months of November - February every year. Currently at Auburn University, I practice 24 hours per week from August - June each year plus multiple competitions that require

1 travel as far as 9 hours away. To earn the opportunity to swim at Auburn University, I
2 was unable to participate in high school and social activities, I missed most weekends
3 and many vacations with my family, I did not have time to nurture other hobbies, I did
4 not have a strong friend group outside of my swim team because I did not have time to
5 grow relationships outside of swim. My family made tremendous sacrifices of time and
6 money to allow me to swim at a high level.

7 3. My achievements in swim during high school attracted the interest of over sixty
8 NCAA coaches across the country. I was a year-round swimmer with USA Swimming
9 with NC Swim Teams - Sailfish Aquatics and #1 Nationally Ranked SwimMAC
10 Carolina. I was a top club swimmer multiple years. I won multiple individual state
11 championships and was a nationally-ranked swimmer. I qualified for multiple
12 national championship meets. I was a two-time USA Swimming Scholastic All-
13 American (USA Swimming Scholastic All-American award recognizes athletes in
14 9-12th grade who have maintained a minimum 3.5 grade point average and met a
15 National Cut time competition criteria in the pool). I was a 5-time National
16 Interscholastic Swim Coaches Association award winner. (In order for a swimmer
17 to be considered as a NISCA High School All-American he must compete for an
18 interscholastic team & be scholastically eligible as determined by the NCHSAA.
19 The athlete must achieve a qualification time in the pool). In 2022, I won the NC
20 High School Athletic Association (NCHSAA) Sportsmanship Award. I was named
21 Most Valuable Swimmer at Northwest Cabarrus High School (Concord, NC) in
22 2021, 2022, and 2023. I am still the school record holder in 7 of 8 individual
23 events. I am a school record holder in 2 of 3 relay events. I was the NCHSAA 3A
24 State Champion in multiple individual & relay events. In 2021, 2022, and 2023, I
25 was recognized by NC Swimming (a division of USA Swimming) as an All-Star,
26 Top-5 fastest, and Top-10 fastest state ranked swimmer in multiple events. NC
Swimming is the most competitive USA Swimming state sending the highest

1 number of athletes to the Olympic Trials each qualifying year.

2 4. My NCAA recruiting experience in 2021 was exhilarating and I compare it to
3 dating. On the first day of recruiting, 31 different coaches contacted me from Yale,
4 Princeton, Harvard, Villanova, UNC Wilmington, University of Georgia, University of
5 Cincinnati, Notre Dame, Dartmouth, Army West Point, Mizzou, Bryant Univ,
6 Michigan, LSU, Minnesota, Miami of Ohio, Binghamton Univ, Univ of Virginia, Univ
7 of Pittsburgh, Utah, Auburn, USC (South Carolina), Indiana University , West Virginia
8 University, Univ of Wyoming, UNC Chapel Hill, Northwestern University, Florida
9 State, University of Louisville, Univeristy of Kentucky, and Cleveland State. Many
10 additional schools contacted me during a period of five days after the recruitment
11 period opened. I spoke with every single coach on the telephone at least one time. Per
12 NCAA rules, I then had to select five schools to visit. I selected Indiana University,
13 Auburn, University of Louisville, Florida State, and University of Kentucky. I was
14 looking for a competitive Men's Swimming program, a personality fit with coaches, a
15 campus that didn't feel too big or too small, a school that had academic majors aligned
16 with my interests, a safe campus, and a safe city within a one-day drive of my home in
17 North Carolina. Of the multiple offers I received, I narrowed my choice to Indiana
18 University because I have family near campus, and Auburn University. Despite Auburn
19 being 370 miles from home and me not knowing a single person in Auburn, I selected
20 Auburn because I felt a strong connection to the coaches, I liked the size of the campus,
21 I loved the swimming and diving facility, and the financial offer that I received of
22 \$15,000 for my freshman season, along with a scholarship and grant that I received,
23 was significant enough to offset the exorbitant out-of-state tuition costs. Coach told me
24 during my recruiting visit that I had a promising future at Auburn and he couldn't wait
25 for me to come into his office at the end of the first season and ask him for more
26 scholarship money because he expected me to have much success my freshman year
and every year thereafter. I felt like I had a home and 4-year career at Auburn as a

1 swimmer and as a result, accepted Auburn's offer and declined a financial offer and
2 spot on the Men's Swimming team at Indiana University. I moved from North Carolina
3 to Auburn in June 2023 to begin my NCAA swim career.

4 5. I learned about the House v. NCAA thirty (30) person roster limit from a
5 SwimSwam news article titled "House Settlement Terms Reveal New Division I Roster
6 Limit of 30 Swimmers and Divers per Team" on July 27, 2024 prior to arriving to
7 Auburn in August for the start of the 2024-2025 swim season. When our team re-
8 convened for our first practices of the 2024-2025 season the first week of August 2024,
9 a buzz among the swimmers about the settlement was building, but because the
10 settlement didn't require the limit until the 2025-2026 season, we didn't think much of
11 it. That all changed quickly in September when we heard from our coaches that the
12 Southeastern Conference (SEC) was discussing a much stricter roster limit of 22
13 swimmers and divers. I knew then that over half our team (currently 48 Men) would be
14 cut at the end of the year. My plan was to swim hard and fight for my roster spot, but I
15 unfortunately had some health issues in September that took approximately six weeks
16 to resolve. I still attended practice, but was not 100%. In October 2024, we received the
17 unfortunate news that the SEC finalized the 22-person roster decision and in a horrible
18 move, made the decision effective immediately for competition rosters during the
19 2024-2025 regular season instead of waiting until the 2025-2026 season per the NCAA
20 v. House decision which impacted many of us not being permitted to travel to away
21 meets this season. Because all of this is still evolving, our coaches have not told us
22 anything with finality, likely because they do not know exactly what will happen
23 regarding limits and cuts for the team creating much uncertainty and stress about our
24 futures with the team.

25 6. This uncertainty has taken a tremendous toll on my mental health. Because of
26 my physical health issue in September, I started the 2024-2025 season from a difficult
place and wasn't allowed to properly recover and heal due to the stress of fighting for

1 my position on the roster. Because of the SEC imposing a 22 person limit this season, I
2 have not been able to travel with the team to away meets and have only been permitted
3 to swim home meets as an exhibition (non-scoring) swimmer only because of the
4 unfortunate timing of my medical issue that made my swim times slower than normal.
5 After being named the SEC Freshman Male Swimmer of the Week on October 10,
6 2024, and being named to the 2024 SEC Academic Honor Roll for outstanding
7 academic accomplishment while competing in intercollegiate athletics, this 2024-2025
8 year and the confusion surrounding SEC roster limits imposed a year earlier than the
9 House Settlement requires and imminent cuts at the end of the season in March of
10 2025, tension has been extremely high and my year has been full of confusion, anxiety,
11 stress, and disappointment. The stress of being a D1 athlete in a normal season is
12 tremendous due to swim practice commitments, the pressure of competitions, the
13 physical toll on my body, finding time to nutritionally fuel properly throughout the day,
14 mandatory academic advising appointments, classes, etc., but the pressure and
15 confusion caused by roster limits has made for a difficult environment causing many
16 team members to sabotage one another for sake of saving the self. It is like the Hunger
17 Games. Team morale has definitely been negatively impacted and coaches are in the
18 unfortunate position of playing favorites and not elevating or working with the
19 swimmers who will likely be cut from the team at the end of the season. The swimmers
20 who have not been permitted to compete due to the SEC's 22 person limit are lame
ducks and not worthy of personal coaching attention.

21 7. If I am cut from the team, I will lose everything that I have worked to build
22 these last two years. I will lose over \$15,000 of athletic financial aid, in addition to
23 losing free tutoring, athletic academic strategy counseling, athlete free meal plan, free
24 health care, free psychological counseling services, free athletic event tickets to
25 football, basketball, and more sports. I had to sign my 2025-2026 housing lease in
26 October 2024 and if I am cut, will be put in a position to try to sublet my home or pay

1 for it in full regardless of my ability to remain a student at Auburn University. If my
2 roommate is cut from the team, but I am not, I will be forced to find a new roommate to
3 offset my housing expenses. Even more difficult to reconcile will be the loss of close
4 friends on the team who will have no choice due to financial constraints to leave
5 Auburn because of the cuts. I have done nothing but swim since I was in middle school
6 and as much as I try not to wrap my identity around swimming, it has been a huge part
7 of my life and I will suffer if my career is unexpectedly cut short before I've reached
8 my peak potential. My family will be in the unfortunate position of deciding whether I
9 can finish my academic career at Auburn solely due to financial reasons.

10 8. As I consider a future different than I planned - being possibly cut from the
11 team due to roster limits but likely not knowing definitively until the late date of May
12 2025, I am processing through many possible paths. My hope is to remain a member of
13 the Men's Swimming and Diving team at Auburn University. I love my home in
14 Auburn, my housing situation is good, I love the town. If I do get cut, I have to consider
15 whether or not I want to continue to swim competitively at a different school (enter the
16 transfer portal only IF I am notified of my cut in time to do so) despite the fact that
17 many of my credits will not transfer to a different school therefore extending my time
18 as a student and overextending my 4 year budget. I might stay at Auburn without
19 swimming despite financial hardship to finish my degree. I might club swim and go
20 back to a USA Swimming team and swim Master's league. I might quit swim. I
21 possibly could withdraw from college altogether and move back home to NC to
22 mentally rest and regroup before figuring out a different life path. While it seems like a
23 no brainer to enter the transfer portal, the issue is that thousands of swimmers will be
24 flooding the portal this year for schools that may already have their rosters full.
25 Additionally, it will be very difficult to assimilate into a team as a junior and that is a
26 major transition and stress in and of itself. The uncertainty and lack of time to create a
new plan is paralyzing so I try to remain in the present and enjoy where I am today


1 because I am well aware that I may not be here in a few months.

2 9. In this declaration, I provided many personal and selfish reasons as to why I am
3 opposed to roster limits. On a larger scale, I am opposed to the strict 22 person SEC
4 roster limit because this limit includes swimmers AND divers. If a swimmer gets sick
5 or injured, there will not be a “bench” swimmer to replace said swimmer, therefore
6 putting a team at a scoring disadvantage. 22 nor 30 athletes is simply enough to develop
7 and maintain a healthy swimming pipeline for the teams. Additionally, many successful
8 male Olympic swimmers did not have a successful college career until they were
9 juniors and/or seniors. Imminent roster cuts may cut men from teams before they have
10 reached their peak around age 22, which is unfortunate and will negatively impact USA
11 Swimming’s Olympic Pipeline. From a larger trickle down affect, roster limits will
12 impact youth swimming because parents are likely not going to sacrifice the cost or
13 family time to allow youth to swim if the dream of NCAA D1 swimming is out of
14 reach. I love the sport of swimming. I love being a D1 athlete. I believe much like
15 swimmers who were impacted by the Covid-19 pandemic year were granted an extra
16 year of eligibility, current D1 swimmers should be allowed to remain on their teams
17 until graduation. It is simply tragic that lifelong NCAA dreams that have been earned
18 by years of tireless work, practice, training will be cut short expeditiously and
19 prematurely by an NIL ruling that was intended originally to benefit athletes but now
20 instead is destroying thousands of athletes by stripping them of their academic and
21 athletic careers.
22
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I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 30, 2025

Lee County, Auburn, AL

Signed by:

 E19EC9764CB74D3...

Harrison Ranier
 NCAA ECID No. 2101997484
 6110 Silver Eagle Way
 Concord, NC 28027

Samantha Anabella Rietbroek
1807 Greenlea Cv,
Southlake, TX 76092

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Samantha Rietbroek. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 2402216351. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Samantha Anabella Rietbroek

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF SAMANTHA RIETBROEK**

9 I, Samantha Rietbroek, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a 2028 at the University of Washington and am a member of the NCAA
11 Division I women's Rowing team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 2. My entire life changed when I started rowing at the age of 14. Before rowing, I
14 felt unsure of myself, didn't consider myself athletic, and struggled to find my place in high
15 school. Rowing transformed everything—it gave me a sense of community, long-term goals,
16 and improved my physical and mental well-being.

17 3. From the very beginning, rowing became my top priority. Friday nights were
18 dedicated to early bedtimes in preparation for Saturday morning practices. Weekday evenings
19 and weekends were consumed by the hour-long drive to and from my boathouse, followed by
20 2-3 hours of practice. Every school break became a training trip. There were no spring break
21 vacations or visits to see my extended family—only rowing. I trained year-round, spending
22 countless hours on the boat, in the weight room, and on the rowing machine to become
23 stronger and faster.

24 4. While these sacrifices meant giving up social events and free time, I would
25 make them again in a heartbeat. Rowing demands an unparalleled level of dedication. It's the
26 first thing on my mind when I wake up for morning practice and the last thing I think about
27 before I fall asleep at night. Being out on the water with my teammates, focusing on my oar
28 cutting through the water, brings me a sense of purpose and peace I look forward to every

1 single day.

2 5. On average, I've trained 3-4 hours a day, six days a week, since I was 14. These
3 countless hours have given me lifelong healthy habits and a bond with teammates who have
4 become my closest friends. As someone who has moved internationally eight times, rowing
5 has been the one constant in my life since my freshman year of high school.

6 6. My journey began as a Novice at New Trier High School in Winnetka, Illinois,
7 then continued at Dallas United Crew in Texas, and now, as a freshman rower at the University
8 of Washington. Each stage has shaped my identity and strengthened my commitment to this
9 sport. I wouldn't have even discovered this university if not for rowing, and I am grateful for
10 the opportunities it has brought me.

11 7. Rowing has truly transformed my life, teaching me the value of discipline,
12 perseverance, and teamwork. Despite the sacrifices, I wouldn't trade this journey for anything.

13 8. My biggest achievements come from rowing. The highest moment of my life
14 come from rowing races. My results include 2024 US Rowing Summer Nationals 1st Place
15 Women's U23 4-, 2024 US Rowing Summer Nationals 3rd Place Women's U23 4+, 2024 US
16 Rowing Summer Nationals 1st Place Women's U19/U23 4x sprint, 2024 Heart of Texas Regatta
17 2nd Place Women's Youth 8+, 2023 Head of the Oklahoma 1st Place Women's Youth 8+, 2023
18 US Rowing Summer Nationals 5th Place U19 4-, 2022 Head of the Hooch 2nd Place Women's
19 Youth 4x, 2022 US Rowing Youth National Championships 9th Place U17 2x, 2021 US Rowing
20 Central Youth Regional Championships 1st Place U17 2x, 2021 US Rowing Midwest Youth
21 Championship 1st Place Girls Novice 4+. I am also a member of the Peruvian National Rowing
22 Team, I am very proud to be able to represent my mother's home country.

23 9. I entered the recruiting process completely unsure of what to expect. My
24 journey began the summer after my sophomore year of high school and ended in the fall of my
25 senior year when I committed to the University of Washington. The process was filled with
26 uncertainty. Some coaches told me I needed to get faster before they could consider me for
27 their program, while others said I wasn't the right fit. For a year and a half, I spent hours every
28 week calling, texting, emailing, and visiting coaches, all while dealing with sleepless nights

1 wondering where I would end up—or if I would even have the opportunity to row in college.

2 10. Initially, the University of Washington wasn't even on my radar. It was so far
3 from home that I had never seriously considered it, and to be honest, I didn't know much about
4 the school. But everything changed after my first call with the UW coaches. From that
5 moment, I knew I had found my future home.

6 11. When I received my offer from the University of Washington, I didn't hesitate
7 for a second. Everything about the program felt right, from the opportunity to row year-round
8 to becoming part of an incredible legacy of strong women. These were women who fought for
9 what they believed in, whether that was winning NCAA championships or championing
10 equality in women's sports—a fight we continue to this day.

11 12. I came to UW with the understanding that I had earned my spot and that as long
12 as I held up my end of the commitment, working hard and constantly striving to improve, that
13 spot would remain mine. However, with the new proposed roster limit, the spot I fought so
14 hard to earn might not be there next year. Despite this uncertainty, I am determined to keep
15 fighting. This is not just a fight for a spot on the roster but for the opportunities and values that
16 brought me to this program in the first place.

17 13. On January 17th, 2025, our team was called into a meeting regarding the NCAA
18 House Settlement. Our coach delivered devastating news: the women's rowing roster cap would
19 be reduced to 68, meaning nearly half of the talented athletes on our team could lose their spots.
20 The room fell silent as the weight of this announcement settled in. Shocked and emotional, many
21 of us were brought to tears. This proposal threatens to undermine the very foundation of our
22 team. Rowing is a sport built on camaraderie, mutual support, and the collective strength of
23 individuals coming together for a shared goal. Cutting athletes doesn't just impact those directly
24 affected—it disrupts the unity and bond that makes rowing more than just a sport.

25 14. This situation is undoubtedly taking a significant mental toll on us as athletes,
26 adding stress and pressure to an already demanding environment. Rowing requires immense
27 mental strength in normal circumstances, but the uncertainty surrounding roster cuts has
28 amplified these challenges. The weight of knowing that some of us may no longer have a place

1 on the team next year is affecting both our athletic and academic performance. It's hard to stay
2 focused when the future feels so uncertain. Despite our best efforts to remain united and
3 supportive of one another, the stress is beginning to strain our team dynamic.

4 15. If I were to be cut, I would lose more than just a spot on the team. I would lose
5 access to financial aid, academic counseling, tutoring, and the unique privileges that come with
6 being a student-athlete. The dining halls where I eat with my teammates, the housing
7 arrangements built around our schedules, and the shared laughter after practices together—all
8 of these moments form my college experience.

9 16. Being part of this team isn't just about rowing; it's about a sense of belonging
10 and identity. My role as an athlete gives me purpose and has shaped who I am today. Losing
11 that connection would be devastating. Most importantly, I would be losing the close bond I
12 share with my teammates—my second family. These relationships, built through countless
13 hours on and off the water, are irreplaceable.

14 17. The possibility of being cut feels like losing a part of myself, as this team has
15 been my home, my support system, and my inspiration to keep pushing forward every day.

16 18. I've had to consider the unthinkable: entering the transfer portal. However,
17 transferring is far from a simple solution. There's no guarantee that other programs will have
18 roster spots available, especially with so many athletes now facing similar situations. Even if I
19 were to find another team, transferring could significantly disrupt my academic progress. Not
20 all course credits transfer seamlessly, and I would risk delaying my graduation or losing
21 progress toward my degree.

22 19. I chose the University of Washington not just for its rowing program but also
23 for its academic excellence. It's a place where I've found a balance between pursuing my
24 athletic goals and earning a degree that aligns with my future aspirations. Leaving would mean
25 walking away from both my athletic and academic dreams, as well as the relationships I've
26 built with my teammates, classmates, and coaches.

27 20. The thought of starting over somewhere else—adjusting to a new academic
28 system, building new relationships, and competing to prove myself all over again—feels

1 overwhelming. Yet, the possibility of losing my place on this team is forcing me to confront
2 these difficult choices, none of which come without significant challenges or sacrifices.

3 21. I respectfully urge the court to reject the proposed roster limits. As a female
4 athlete, this proposal feels deeply unfair and undermines the progress we have made under
5 Title IX. Allocating resources disproportionately to men's sports, such as football, while
6 capping opportunities for women's rowing sends a harmful message: that female athletes are
7 less valued. Rowing is one of the few sports that offers women this level of opportunity, and
8 imposing these limits threatens to undo decades of progress.

9 22. Women's rowing demands patience, perseverance, and long-term development.
10 Athletes often spend their first year—or longer—learning the sport and building the physical
11 and technical foundation required to compete at the highest level. Capping rosters at 68 will cut
12 athletes during critical stages of their development and will stifle their potential before they
13 even have the chance to show what they're capable of. Many Olympic rowers from the
14 University of Washington, both from the U.S. and internationally, started as developmental
15 athletes. If this cap had been in place, those athletes might never have achieved greatness.

16 23. Beyond individual growth, rowing is built on teamwork, inclusivity, and a
17 shared culture of mutual support. Cutting rosters to such a limited number undermines this
18 foundation. With only 68 spots, the margin for illness or injury leaves little room for
19 adjustment. Additionally, the December 1 deadline is poorly timed—it coincides with a crucial
20 academic period when athletes are preparing for finals. The stress of this deadline, combined
21 with the academic pressure, compromises both mental well-being and performance. To make
22 matters worse, the transfer portal opens after the deadline, limiting athletes' ability to find
23 other opportunities and leaving them in a state of limbo.

24 24. Personally, if this cap goes into effect, I would lose not only my spot on the
25 team but also my sense of identity, my purpose as an athlete, and access to the resources that
26 have helped me thrive academically and personally. Rowing has given me a community,
27 lifelong friendships, and the confidence to chase my dreams. Without it, I feel as though I
28 would lose a part of myself.

1 25. This decision has far-reaching consequences that go beyond individual
2 athletes—it sets a precedent for devaluing women’s sports. Progress takes time, and women’s
3 athletics are still in the early stages of growth. We need more support, not more restrictions. I
4 urge the court to reconsider the devastating impact this proposal will have on women’s sports,
5 on our development as athletes, and on the legacy of perseverance and opportunity that rowing
6 embodies.

7 26. Please allow us the chance to continue pursuing our dreams, to grow as
8 individuals and athletes, and to uphold the values of teamwork, inclusivity, and dedication that
9 make collegiate rowing so special.

10 I declare under penalty of perjury that the foregoing is true and correct.

11
12
13 Dated: Seattle, Washington
14 January 28, 2025



Samantha Rietbroek
NCAA ECID No. 2402216351
1807 Greenlea Cv,
Southlake, TX 76092

Jake Rimmel
622 Kinvarra Pl
Purcellville, VA 20132

January 20, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Jake Rimmel. I am a current Division I athlete at Virginia Polytechnic Institute and State University and my NCAA ECID number is 2110358456. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,

/s/ Jake Rimmel

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF JAKE RIMMEL

9 I, Jake Rimmel, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a sophomore and, until December 2024, a member of the NCAA Division I
11 track and field team at Virginia Polytechnic Institute and State University ("Virginia Tech"). I
12 am a member of the Injunctive Relief Settlement Class and object to the settlement both
13 individually and on behalf of the class.

14 2. I have been a runner since I was young, and my passion for running has driven
15 me to compete at the highest levels. In high school, I was a nine-time All-State honoree, a two-
16 time state champion, and an All-American as part of a distance medley relay team.

17 3. At Virginia Tech, I have continued to develop as an athlete. In the 2024 outdoor
18 track season, I set personal records of 3:48.66 in the 1500m at the Hill City Twilight and 1:53.04
19 in the 800m at the Wake Forest Invitational. I am also proud to have made the ACC Academic
20 Honor Roll which I achieved by balancing athletics while maintaining a strong GPA.

21 4. Virginia Tech felt like the right fit for me because of its strong athletic culture
22 and supportive teammates. As a walk-on athlete, I have worked hard to continue to develop as
23 a runner and to contribute to the team.

24 5. I heard about the roster limits issue in Summer 2024, although we did not receive
25 any official communications regarding the issue from Virginia Tech. Last March, four students
26 were cut from the track team, followed by another four students in June. After surviving those
27 cuts, I felt a sense of security with respect to my spot on the roster.

28 6. However, in late December 2024, I was told I was being cut from the team, along

1 with three other students. My coach explained that the new roster limits left no room for
2 developmental athletes like me. He was disappointed and expressed how difficult it was to make
3 these cuts.

4 7. Virginia Tech's track program has a strong tradition of supporting developmental
5 athletes—students like myself who show a lot of promise but need time and coaching to progress
6 to the level. There are many athletes like myself on the team who are strong runners, but are not
7 quite fast enough to earn the required scores at conference meets. Coaches have worked hard to
8 train these athletes so they can eventually contribute to the team's success.

9 8. After being cut, I have decided to enter the transfer portal to try and find a
10 university where I will have the opportunity to compete. Finding a team through the transfer
11 portal has been difficult given the large number of runners who were also cut and are also trying
12 to transfer. There's an oversaturation of student athletes that have been displaced because of the
13 proposed roster limits.

14 9. Being cut from the team has disrupted both my athletic and academic life.
15 Without access to the athletic program, I am no longer able to run or train with the team, and no
16 longer have access to important athletic and academic resources that were critical to my
17 development both as a student and as a runner.

18 10. The implementation of roster limits undermines the mission of collegiate athletics
19 by depriving student-athletes of opportunities to develop and compete. If the settlement is
20 approved, thousands of student-athletes like me will lose the chance to pursue their passions and
21 achieve their potential.

22
23 Dated: Blacksburg, Virginia
24 January 20, 2025



Jake Rimmel
NCAA ECID No.2110358456
622 Kinvarra Pl
Purcellville, VA 20132

Addyson Roberts
529 26th Street
Virginia Beach, VA 23451

January 30, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Addyson Roberts. I am a current Division I athlete at Liberty University and my NCAA ECID number is 2101988408. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Addyson Roberts

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF ADDYSON ROBERTS**

9 I, Addyson Roberts, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a Freshman at Liberty University and a member of the NCAA Division I
11 Women's Swim and Dive team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 2. In high school, I swam for more than 30 hours a week to prepare for college
14 swimming. I often missed holidays, events, school trips and programs, and many other things in
15 pursuit of my dreams to swim at the Division I NCAA level.

16 3. I am a 3-time high school state champion, a member of the TIDE Swimming
17 National team, a district, regional, and state record holder, and a 4-time High School All
18 American.

19 4. I was recruited by multiple Division I schools and visited many wonderful
20 campuses and programs during my junior and senior year. Every school offered promises of a
21 wonderful swimming and educational career. It was wonderful to have options, but at the same
22 time made it difficult to choose a school. My choice ultimately came down to what program
23 could make me better as an athlete and give me the opportunity to get a quality education.

24 5. The recruiting process was the most overwhelming and draining process I have
25 experienced to date. To have to go through that again, after having been offered a spot I thought
26 I would have for 4 years would be very difficult.

27 6. I learned about the roster limits at practice one day in the fall. We currently have
28 35 swimmers and divers, and were told that, in order to meet the new regulations, that number

1 would have to be cut down to 30. Suddenly, everyone on my team was my competitor. The
2 stakes were raised so high as a new freshman navigating college and being a college athlete.
3 Things such as illness and injuries became a huge deal and weighed heavily on all of us. It is
4 hard to face such uncertainty while working so hard alongside your teammates who are also
5 facing the same thing.

6 7. The stress that these roster limits have brought onto our team is immense.
7 Everyone feels like they can't get sick or injured. Your friends and roommates are now all
8 competing for the same spots. The mental and physical toll of not knowing what next year will
9 bring, while you are working the hardest you've ever had to work at anything in your life, is
10 exhausting.

11 8. If I am cut from the team, I will miss the community of swimmers and coaches,
12 who I chose for their leadership and values, the most, along with the way they made me feel like
13 I'm a part of something so important and special. I would lose the ability to represent my school
14 in a meaningful way, and possibly the chance to swim at the collegiate level.


15 9. The transfer portal is already overused by so many athletes, and the roster limits
16 will cause it to explode with more swimmers that are all looking for a place to go. Swimming is
17 my passion, so I would have to try to leave my school and find a new place to go, uprooting the
18 college experience I thought I'd have for 4 years. The NCAA asks us to be honorable, leaders,
19 and have integrity in our sports and on our campuses, yet they offer no protection to us as student-
20 athletes.

21 10. I believe that student athletes that have already committed to their schools and
22 are continuing to add value to their programs should be exempt from roster limits and that roster
23 limits should only affect the incoming classes, it they should affect anyone at all. I believe that
24 coaches should have the ability to decide what is best for their athletes and programs.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Virginia Beach, Virginia

January 30, 2025

Signed by:

 3A2D009A3DA847D

Addyson Kay Roberts
 NCAA ECID No. 2101988408
 529 26th Street
 Virginia Beach, VA 23451

Sarah Ross
87 Glendale Road
Agawam, MA 01001

January 17, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Sarah Ross. I am a current Division I athlete at University of Massachusetts – Lowell and my NCAA ECID number is 2008907152. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
/s/ Sarah Ross

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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8 **DECLARATION OF SARAH ROSS**

9 I, Sarah Ross, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a senior and Division I runner at the University of Massachusetts Lowell. I
11 am a member of the Injunctive Relief Settlement Class and object individually and on behalf of
12 the class.

13 2. Coming out of high school, I wanted to find a school where I could pursue my
14 academic goals and compete for a team that would help me improve and contribute. Being from
15 a small high school program, I was somewhat inexperienced in training, and my times were not
16 within some comparable programs' recruiting standards. But I was fortunate to receive the
17 opportunity to join this UMass team that prides themselves on Mill City grit, led by a coach that
18 believes in potential and good people. Our team consists of athletes that played other sports or
19 started running later in high school, of athletes that overcame injuries, of walk-ons who showed
20 tenacity and have become our leaders, and of local and international athletes who share the
21 common goal of bettering themselves for the success of the team.

22 3. From the outside looking in, recruiting for track and field appears to be very
23 quantifiable. Coaches have access to times, marks, and placements in meets. But athletes,
24 coaches, and others close to the sport know that success is about so much more than just these
25 numbers. The implementation of these roster limits means that the opportunity to compete at the
26 collegiate level for so many athletes with potential far beyond their high-school numbers will
27 cease to exist. And the future of track and field, which rests on their shoulders, is at stake.

28 4. Now, as a senior, I can confidently say that being a part of UMass Lowell's track

1 and field and cross-country team has been the best aspect of my college career. This team has
2 given me my best friends, role models, and the opportunity to contribute to the Women's Team's
3 first indoor track Conference Championship since the program transitioned to Division I. I think
4 that result refutes the misconception that track and field is an individual sport. It always rang
5 true for us that every person and every point matters, but this was exemplified when the
6 championship was decided by half of a point. Every throw, every jump, every sprint, and every
7 final kick someone gritted out mattered.

8 5. A team culture of leaving everything on the track, pushing through when it hurts,
9 and competing for something bigger than yourself is integral to the sport. With the proposed
10 roster limits, the meaning of a cohesive team is threatened. With less available spots, teams may
11 choose to specialize in certain event groups. This means that the conference and national
12 championships will be won by teams that perhaps are great in one discipline, but not all of them.
13 This is antithetical to the idea underpinning track and field: the best teams depend on the
14 contributions of athletes in every discipline.

15 6. When considering the value of college athletics, themes of opportunity,
16 friendship, discipline, and pursuit of the best version of oneself are prevalent. In the face of
17 change that undermines these core principles, the love of sport remains. Although I am fortunate
18 to compete for a school that will be opting out of the settlement, since the ramifications of this
19 decision will affect many current and future athletes, all the NCAA is affected.

20 7. Thus, it is all of our duties to protect the opportunity to compete, to meet one's
21 best friends, to develop, and to pursue a college education that we were all so lucky to receive
22 because of sport. I implore decision-makers to prevent the House v. NCAA settlement—
23 including the roster limits—from eliminating the possibility for future athletes to share in the
24 unique, wonderful world of college athletics. We would not be here if someone had not taken a
25 chance on us; you must help to protect others' chances.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Dated: Lowell, Massachusetts
3 January 17, 2025

Sarah E. Ross
Sarah Ross

4 NCAA ECID No. 2008907152

5 87 Glendale Road
6 Agawam, MA 01001
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Megan Rourke
14 Stratford Lane
Ho-Ho-Kus, NJ 07423

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Megan Rourke. I am a current Division I athlete at College of William & Mary and my NCAA ECID number is 2105164494. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Megan Rourke

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF MEGAN ROURKE

I, Megan Rourke, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a sophomore at the College of William & Mary and am a member of the NCAA Division I Men's and Women's Swim Team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. Our coaches have explained to us that roster limits, if implemented, will cause our team to incur and suffer from cuts of four of our teammates. We do not yet know if these will be athletes currently on our team, incoming freshmen, or a combination. We do not want this and feel we should not have to worry about losing teammates or have any concerns surrounding our own position on the team. Added stress does not help performance or team spirit. Nor will a limited roster benefit our team.

3. We function as a team in and out of the pool. We eat together, study together, relax together, and live together; we have strong mentoring systems on our team and pride ourselves on helping one another in and out of the pool; we are a tight, supportive group. We worked incredibly hard throughout high school in order to have this opportunity; we all want to remain on this team and at our school, together. We do not feel roster limits help our team or our sport, but they will negatively impact those who are cut and our team at large.

I declare under penalty of perjury that the foregoing is true and correct.

1 Dated: Williamsburg, VA
2 January 28, 2025

Signed by:

Meghan Rourke

8C45412BBDA3420...

Megan Rourke
NCAA ECID No. 2105164494
14 Stratford Lane,
Ho-Ho-Kus, NJ 07423

Ella Ryter
8201 Corliss Ave N
Seattle, WA 98103

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Ella Ryter. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 2209667973. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Ella Ryter

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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8 **DECLARATION OF ELLA RYTER**

9 I, Ella Ryter, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am part of the class of 2028 at the University of Washington and am a member
11 of the NCAA Division I women's rowing team. I am a member of the Injunctive Relief
12 Settlement Class and object both individually and on behalf of the class.

13 2. To become a Division I college athlete, I spent five years competing with the
14 rowing club Green Lake Crew. We practiced for about 15 hours a week, six days per week.
15 Additional hours were spent commuting to practice, preparing for and competing at races,
16 running bake sales to fundraise, and putting in additional hours of individual exercise. I left my
17 high school class early every day in order to arrive at rowing practice with sufficient time to
18 prepare the equipment. I spent many of my weekends competing at rowing regattas, and if there
19 was not a regatta, I had to catch up on homework from previous weeks that were dedicated to
20 regattas. I was unable to attend my high school's prom dance due to competition, and many of
21 my teammates missed their high school graduation when they were traveling to a regatta. My
22 parents were never able to spend as much time with me as they hoped, but they supported me
23 and paid the steep fees necessary to keep practicing and competing. This dedication was worth
24 it because I received the opportunity to race at the USRowing Youth National Championship for
25 three years before joining the University of Washington's rowing team.

26 3. I was honored to be recruited by the University of Washington because they have
27 one of the most successful women's rowing programs in the United States. I grew up in Seattle
28 reading *Boys in the Boat* and hearing about their legacy. I was attracted by the incredible

1 resources the school provides for their athletes to improve, their strong team culture, and their
2 desire and plan to get better every day. When I was recruited, I was told that I could remain on
3 the team as long as I was a great teammate who showed good character and sought to improve
4 every day. Now, my future place on the team is uncertain.

5 4. Our rowing team has the second largest roster after football at the University of
6 Washington. If the roster limits were enacted, about one third of my team would lose their spot.
7 It is nearly impossible for me to imagine the full scope of the negative impacts that could occur
8 for myself, athletes on my team, and across the nation. Freshmen who are committed to join our
9 team in Fall 2025 now face the heightened pressure of actually making the team.

10 5. This proposed roster cap has already been detrimental to my mental health, and I
11 know my teammates are struggling too. Student athletes have extremely busy and stressful
12 schedules all year, and this added pressure makes it difficult to navigate daily activities
13 effectively. If I am cut, I will lose access to athlete tutoring, academic counseling, mental and
14 physical health support, eating at the athlete dining hall with my teammates, and I would not be
15 able to see my closest friends as often. Since I love the academics at the University of
16 Washington, I will likely not consider the transfer portal next year. If cut, I would be unable to
17 keep participating in the sport that I love so much. My life has been filled by rowing for a long
18 time, and I cannot imagine what my day would look like without it. I thrive on being busy and I
19 feel valued when I help the team improve every day.

20 6. Development in rowing takes time. Teams like ours, who contend perennially for
21 conference and national titles, are made up of athletes who develop physically and technically
22 over four years. It is not unusual for a student athlete to learn and develop for a year or more
23 before competing in a conference or NCAA championship. The roster cap could remove these
24 student-athletes at a peak stage of development and before they are able to compete at a
25 conference or NCAA level.

26 7. Historically in women's rowing, because most athletes don't peak until their late
27 20s, the development years in college are critical for Olympic women's rowing. We have had
28 both American and international student-athletes start out in development boats on the squad and

1 later go on to represent their national and Olympic teams. Many of Washington's Olympic
2 medalists learned the sport at UW and would have likely been cut with the December 1 deadline.

3 8. Walk-ons in our sport are different from walk-ons in other sports. Some of our
4 rowers are top athletes from other sports who are true novices that learn the sport of rowing from
5 scratch upon arrival at university. We are a quarter school that begins school and training at the
6 end of September. The December 1 roster cap deadline gives us only two months to develop and
7 determine the final 68 people who will be allowed to compete in the spring.

8 9. 53 Student athletes compete in the Big Ten championship in mid-May. A roster
9 cap of 68 leaves little room for illness or injury. Some teams will struggle to field all of the
10 lineups.

11 10. The timing of the proposed roster caps does not take student athlete well-being
12 into account. The December 1 roster cap date for spring sports is a terrible time academically as
13 all student athletes are preparing for final exams for fall quarter/fall semester. The transfer portal
14 opens in December, but because it opens after the roster cap deadline, those who go into the
15 portal will be going in at a time of lower demand, reducing their options of competing that year.

16 11. The proposed House Settlement harms far more student athletes educationally
17 and emotionally than the very few who will benefit monetarily. Having a smaller rowing roster
18 will increase stress on athletes, remove opportunities for athletes who require more time to
19 develop, and drastically change the lives of those who are cut. So many athletes across the nation
20 are grateful to simply be on a team, regardless of if they receive opportunities to compete or not.
21 These athletes still add to a team's culture, and they help their teammates improve. I hope you
22 reconsider the roster caps due to their negative impact on thousands of student athletes across
23 the nation.
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1 I declare under penalty of perjury that the foregoing is true and correct.

2 Dated: Seattle, WA

3 January 26, 2025

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5 _____
6 Ella Ryter
7 NCAA ECID No. 2209667973
8 8201 Corliss Ave N
9 Seattle, WA, 98103
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Calvin Schaper
1 Aman Ct.
Durham, NC 27713

January 21, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Calvin Schaper. I am a high school junior and swimmer, and my NCAA ECID number is 2401200620. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Calvin Schaper

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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8 **DECLARATION OF CALVIN SCHAPER**

9 I, Calvin Schaper, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a 16-year-old swimmer and junior at Research Triangle High School in
11 Durham, North Carolina. I am a member of the Injunctive Relief Settlement Class and object
12 both individually and on behalf of the class.

13 2. I have been swimming as long as I can remember. My earliest memories are in
14 the pool. I started swimming competitively a decade ago, when I was 6 years old. It is not an
15 exaggeration to say that swimming is my life.

16 3. I swim for my high school and the Carolina Aquatic Team, a USA Swimming
17 club. My specialty is the 100 yard/meter and 200 yard/meter breaststroke, and my times are
18 competitive, to say the least. I've been the USA Swimming North Carolina state breaststroke
19 champion twice since I was 13 years old. Last year, I was the 10th fastest 100LCM breaststroker
20 in the country for my age, and I won the high school state championship. I'm also one of the
21 top 500 breaststrokes in the world (for all ages).

22 4. I am proud of what I've accomplished. It has taken a lot of sacrifice to reach that
23 level. I practice 8 times a week for 2-3 hours per session. Altogether, I'd estimate that I have
24 spent 20 hours per week on training for the last decade. At the same time, I have maintained a
25 4.5 GPA in high school so far.

26 5. In swimming, college recruiting starts in June between sophomore and junior
27 years of high school. I had high expectations because I witnessed many older friends go through
28 the same process. Typically, schools will invite a potential recruit to visit campus during the

1 Fall of their junior year in high school. I knew my times made me competitive for many Division
2 I programs because I saw swimmers who are older than me be recruited with times that were
3 similar or worse than mine.

4 6. I started the recruiting process in June 2024 determined to follow the same path
5 I saw my friends follow. I sent about 100 emails to as many different schools, asking to be
6 invited to see the university. But instead of interest, I mostly got crickets. I was shocked. At
7 one of my high school meets before the settlement was announced, a state college coach came
8 out to watch me and talked to me afterwards, clearly expressing interest in joining the team. But
9 now, he is quiet – and so was everyone else.

10 7. I have gotten emails and phone calls from some coaches, but no offers. Those
11 coaches told me that they were drastically reducing their recruiting this year, with some only
12 taking 6 or even just 2 male swimmers for their entire freshman class. Last year, my times would
13 have comfortably landed me at least a few invitations to campuses. This year, they didn't get
14 me anything. As of now, I have yet to be invited by any school to any campus.

15 8. I follow the news, and so I knew about the roster limits proposed in the *House v.*
16 *NCAA* settlement. Most of the schools I spoke to have swim rosters larger than the proposed
17 roster cap of 30 for men's swimming. It is no coincidence that this year, the recruiting season
18 has been silent. All the schools I have spoken to will have to make cuts to their rosters to meet
19 the cap, and limit their recruits – in other words, limit me.

20 9. The roster limits are a terrible idea. I am not a slow swimmer. But the limits
21 apparently leave universities with no capacity to develop young swimmers at all. Since many
22 international students come to U.S. schools to compete, the roster spots available to someone
23 like me are even more limited. I know I could make it to their level if I am given training and
24 investment. But with the roster limits, it seems like I won't even get the chance.

25 10. Roster limits mean hundreds of perfectly competitive swimmers will be forced to
26 give up competing in their sport because after high school, the only path to continue swimming
27 competitively is through college. The recruiting process was competitive enough without roster
28 limits. I personally know many other fast swimmers who were so discouraged by the intensity

1 of recruiting that they didn't even try, and that was *before* the roster limits. With roster limits,
2 more will be discouraged from pursuing their sports in high school and college – even if they
3 are good!

4 11. Roster limits will also destroy the swimming community. It raises the barrier of
5 entry to the sport when that barrier was already too high. The doors are currently being slammed
6 in the faces of current college swimmers and 2025 recruits, but the roster limits will ensure that
7 I am next. I am already being held back by them, because no college will give me a second look.

8 12. The complete shutout I have experience in the recruiting process has caused me
9 significant stress. I feel stuck. I worked my whole life to get to a level I knew is good enough
10 to get into a Division I swim program, and I never thought I could be forced to quit overnight
11 due to something that wasn't my fault.

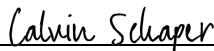
12 13. The proposed roster limits will destroy swimming, not just for me, but for many
13 swimmers younger than me. Please do not approve them.

14 I declare under penalty of perjury that the foregoing is true and correct.

15 Dated: Durham, North Carolina

16 January 21, 2025

Signed by:



Calvin Schaper

NCAA ECID No. 2401200620

1 Aman Ct.

Durham, NC 27713

Alex Schwartz
3351 Lapp Lane
Naperville, IL
60564

January 23, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Alex Schwartz. I am a current Division I athlete at the University of Missouri and my NCAA ECID number is 2303795552. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,

Alex Schwartz

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF ALEX SCHWARTZ

I, Alex Schwartz, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am freshman at the University of Missouri and am a member of the NCAA Division I men's swim team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. I had to put in at least 18 hours of swim training a week during high school to get to a level where I could swim collegiately. This forced me to miss out on many activities, especially in the band, where I was the first chair Bass Clarinetist and missed many competitions due to my conflicts with swim.

3. I was initially recruited based on my times from the 2024 Illinois High School State Swim Meet, where I had the fastest 50 Freestyle split in the state. Also, I became a 20-second 50 freestyler in my individual event for the first time, achieving Academic All-American awards in both my Junior and Senior years.

4. I came to Mizzou as an athlete with early success in the sport of swimming under the premise of being developed by the coaching staff. Mizzou coaches promised to develop me to my fullest potential. If I were to lose my spot on the team, I would be forced to look for another school to compete with, and risk losing my four-year academic scholarship which totals over eighty-thousand dollars for undergraduate studies.

5. The roster restrictions per the House v. NCAA settlement were not in place

1 when my teammates and I went through recruiting and chose to attend the University of
2 Missouri. My freshman-year experience has been significantly impacted by the tension
3 and concern created by these forthcoming roster cuts, having created significant stress
4 and uncertainty over my future as a collegiate athlete in the SEC. I came to Mizzou as
5 an athlete with early success in the sport of swimming under the premise of being
6 developed by the coaching staff. Forthcoming roster limits will eliminate any
7 opportunities to develop rising athletes like myself, and SEC swim programs will suffer
8 from a developmental standpoint.

9 6. The Mizzou coaches were very open about the roster cuts being up in the air,
10 advising that the only athletes who would be guaranteed a spot were those who made
11 the NCAA championship.

12 7. These roster cuts have placed me in a vulnerable position to now begin a search
13 for a different school, most likely outside of the SEC conference, that will afford me the
14 opportunity to compete. In addition to the mental strains of this sport, this has created
15 added stress based on my uncertainty about where I will be attending college in my
16 sophomore year.

17 8. Notwithstanding potential financial losses that may result from roster cuts,
18 Athletic Dining, training, and other benefits as a student-athlete at Mizzou are now all
19 at risk of being taken away from me with the looming reorganization efforts. Tutoring,
20 academic counseling, eating at a special dining hall with teammates, award money, and
21 the uncertainty of not knowing where I will be residing next year as I mentioned above
22 are now all at risk.

23 9. As a student-athlete, I have no intention of forfeiting my right to compete on a
24 college team. To do so, I will be forced to seek other options, including the transfer
25 portal.

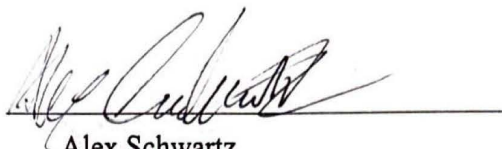
26 10. In the past five months, I have developed enormous pride in becoming a Mizzou
Tiger and in the opportunity that I have been given. Becoming an SEC swimmer has

1 not been an easy path, but I came here intending to maximize this opportunity to
2 develop athletically, academically, and personally. Grandfathering current athletes
3 would allow me to continue on my path of development to realize my full athletic
4 potential. It is my hope before these decisions become a reality, further consideration
5 will be given to these sweeping roster cuts.

6 I declare under penalty of perjury that the foregoing is true and correct.

7 Dated: Columbia, Missouri

8 January 23, 2025



Alex Schwartz

NCAA ECID No. 2303795552

3351 Lapp Lane

Naperville, IL

60564

Julia Seeley
19564 Greggsville Rd
Purcellville VA, 20132

January 29, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Julia Seeley. I am a current Division I athlete at Liberty University and my NCAA ECID number is 2307964420. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Julia Seeley

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4
5 IN RE COLLEGIATE ATHLETE NIL
6 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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8
9 **DECLARATION OF JULIA SEELEY**

10 I, Julia Seeley, hereby declare as follows pursuant to 28 U.S.C. §1746:

11 1. I am a Freshman, 2028 at Liberty University and am a member of the NCAA
12 Division I women's cross country and track and field team. I am a member of the Injunctive
13 Relief Settlement Class and object both individually and on behalf of the class.

14 2. During high school I practiced twelve hours a week, consisting of two hour
15 practices Monday- Saturday and sometimes Sunday, which adds up to five hundred and eighty
16 eight hours of practicing a year. In order to reach the goal of a Division 1 college athlete I had
17 to sacrifice going out with friends and missing social events. I missed going to school basketball
18 games with my friends because my body needed at least eight hours of sleep per night so I could
19 train well the next day.
20

21 3. I placed second in the 800m junior year at the Virginia State Catholic Track &
22 Field Championships and second place my senior year at the Virginia State Catholic XC
23 Championships in the 5k. I helped lead my high school team to back- to- back first place team
24 victories at the Virginia State XC Championships- an accomplishment that had never been
25 achieved in program history. I am a six- time Adidas Nationals Qualifier in indoor and outdoor
26 track, and a two-time Adidas All American in the 4 x 800.
27

28 4. I had a wonderful recruiting experience, I had great conversations with all the

1 coaches I spoke to. I was looking for a team and school that was centered around Christ and is
2 outspoken about their Christian beliefs. I was also looking for a team that had an uplifting and
3 positive culture. Coach Mark Fairley was the reason I chose Liberty. His coaching philosophy
4 is top notch; he has helped me overcome my mental struggles, gives me the confidence I need
5 to compete and to push through challenging workouts. When I committed to Liberty I was told
6 I would be competing and on the roster for four years. The words ‘your cut’ were not in my
7 future, I was on a specific track to peak in my junior year of college. I was told not to worry
8 about financial cost because scholarship would be in my future. I was told that my coaches saw
9 a lot of potential that once tapped into I would be a top athlete. I turned down a full ride to
10 compete at Liberty because of the promises my coaches told me and I was given an opportunity
11 to run Division 1.
12

13
14 5. I became aware of the roster limits when we had a team meeting. The Liberty
15 NCAA representative came and explained the situation to us. Later that evening our coaches had
16 another meeting with us explaining again how it was affecting each individual athlete and the
17 team. The cuts will be happening after the 2025 outdoor track season. This ruling is affecting
18 twenty five thousand or more athletes across the country. Thirty girls on Liberty University's
19 team, including me, have been negatively impacted. Between ten to twenty freshman recruits
20 have been robbed a chance to compete at the Division 1 level. The opportunity I had a short
21 while ago is no longer achievable for them. If the roster limits are not adopted by the court, I
22 will have my spot on Liberty University’s Cross Country and Track and Field team but if they
23 agree on the roster limits my opportunity to continue competing is over.
24

25 6. This ruling has taken a toll on my mental health. I started the school year off with
26 stability and security knowing that I would be at Liberty for the next four years. Since I will be
27 cut after my outdoor season of 2025, the fear of the unknown is causing anxiety and unnecessary
28

1 levels of stress. From the conversations I've had with my teammates, they have experienced
2 some level of anxiety and sadness. No one knows what the team will look like in the future but
3 change is never an easy task, especially for a close team. When I found out about the ruling, it
4 impacted my last Cross Country race of the season. I felt mentally defeated and that there was
5 no point in trying because I will be cut.

6
7 7. If I am cut I will lose my title of a Division 1 athlete which I've worked hard for
8 5 years. I will lose access to tutors, academic counseling, financial counselors, athletic trainers,
9 meal plans, eating at special dining halls with teammates, medical treatment, and my rooming/
10 housing situation for next year is uncertain. My family and I do not know where I will be next
11 year and this ruling has caused high levels of stress for my family.

12
13 8. I had to enter the athletic portal in November to look for opportunities. Spots are
14 very limited at other schools because this ruling has affected every athlete across the nation. If I
15 stay at Liberty I will no longer be able to compete but I can continue to pursue my degree. If I
16 transfer relationships with friends will change and I will be alone. Academically speaking- only
17 some of my course credits will transfer, making graduation longer for me to achieve. I may have
18 to change my major, which will add more money and time to graduate.

19
20 9. Roster limits should not be allowed. So many opportunities for women are being
21 taken away from us. The years of hard work, determination and perseverance were for nothing.
22 I am living in fear of the unknown everyday, I do not know where I will be next year. I will have
23 to leave Liberty University, my friends, coaches and support group to an unknown place.
24 Running under a new coach and learning their routine not only takes a toll mentally and
25 physically but is frightening for a nineteen year old girl. I ask that you will listen to my plea and
26 my fellow teammates from across the country and you will not pass this ruling. We have worked
27 very hard to get here and all our goals and dreams have been crushed.
28

10. I declare under penalty of perjury that the foregoing is true and correct.

Dated: Lynchburg/Campbell County,
Virginia

January 29, 2025

Signed by:

Julia Seeley

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Julia Seeley

NCAA ECID No. 2307964420

19564 Greggsville Rd

Purcellville, Virginia 20132

Brody Singley
54178 Faraway Place
Callahan, FL 32011

January 19, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Brody Singley. I am a current high school student and swimmer and my NCAA ECID is 2301754812. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Brody Singley

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF BRODY SINGLEY**

9 I, Brody Singley, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a senior at West Nassau County High School. I am a competitive swimmer
11 and Division 1 recruit. I am a member of the Injunctive Relief Class, my NCAA ID is
12 2301754812 and I object individually and on behalf of the class.

13 2. I started taking swimming seriously at a very young age. I have won Florida High
14 School Athletic Association Class 2A State Championships my junior and senior year with wins
15 in the 200-yard and 500-yard freestyle and 100-yard fly. I also competed at the Futures
16 Championship in 2022, 2023, and 2024, and traveled and competed at the Winter Junior
17 Nationals in 2022, Summer Junior Nationals in 2023, and Open Water Nationals in 2023. My
18 family and I invested considerable time and resources in allowing me to compete in these
19 tournaments, which were sometimes held in places as far away from my home in Florida as
20 California.

21 3. My performance in high school earned the attention of several college swim
22 teams. Beginning the summer before my junior year, I talked with and visited top programs like
23 Florida, Arizona State, and Indiana. I ultimately decided to attend Auburn University, owing to
24 the high level of competition and strong swim team culture it had to offer.

25 4. As the process normally goes, I made a verbal commitment to Auburn's head
26 coach in November of my junior year. I was thrilled to have something new to train for each
27 day. The process seemed to be going off without a hitch; per the athletic department's
28 instructions, I submitted my application to the school in September and put down my housing

1 deposit.

2 5. Then, only a week before signing day in November, I received a phone call from
3 the coach at Auburn. He informed me about the *House v. NCAA* settlement and the associated
4 roster limits. Due to the roster limits, he said the program would have to cut their roster down
5 from over 40 swimmers to just 22.

6 6. He then gave me two options: I could either decommit right away, lose my
7 guaranteed spot, and maybe have a shot to try out in the summer. Or, I could wait it out a bit
8 more, but he said it was likely that I would be cut.

9 7. This news has thrown my plans for next year entirely up in the air. I have been
10 preparing practically and mentally to attend Auburn in the fall. Now, I have to scramble to try
11 and explore other programs before applications close. This process is further complicated by
12 the fact that many other recruits have lost their spots due to the roster cuts. Because so many
13 other swimmers have also been cut from their college teams, the recruiting pool is oversaturated.

14 8. I have reached out to countless schools, only to be told that there are simply no
15 spots left. This is in stark contrast to my first recruiting experience, which felt geared towards
16 factors like whether the school was a good fit academically and athletically. Now the only
17 consideration seems to be whether the team has already reached the roster limit or not.

18 9. I have been told by coaches that, if the roster limits are approved, incoming
19 freshman athletes will be held to extremely high standards. Coaches will be looking to only
20 bring in swimmers who can score at conference championships as a freshman.

21 10. This will hurt the experience of underclassmen swimmers. They will be forced
22 to rush through their transition into college in a very negative way. The pressure of competition
23 is hard enough without the additional knowledge that you are competing for your spot on the
24 team at all.

25 11. The roster limits have also caused my family considerable stress over the loss of
26 my scholarship offer. I was offered an athletic scholarship that would have covered \$9,000
27 worth of room and board per year and with the potential for that to increase over my time at
28 Auburn. Now, we are left wondering whether I will be able to get scholarship money from any


1 program at all.

2 12. I am extremely saddened and frustrated that these roster limits only became an
3 issue the year I was hoping all my hard work in the pool was going to pay off. I trained my
4 whole life to be at a high enough level to get my college swimming offer, and now it feels like
5 my whole life was spent on nothing.

6 13. Getting my roster spot revoked was a huge shock and felt like a betrayal. I always
7 thought the NCAA was around to provide opportunities for hard working student athletes who
8 wanted to reach their full potential. The roster limits do the opposite – they are killing our
9 potential as athletes and as students early. They should not be approved.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Dated: Callahan, Florida
12 January 19, 2025



Brody Singley
54178 Faraway Place
Callahan, FL 32011
NCAA ECID 2301754812

Jake Sisk
18 West Princeton Circle, Apt. 28
Lynchburg, Virginia 24503

1/29/2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Jake Sisk. I am a current Division I athlete at Liberty University and my NCAA ECID number is 2301753897. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Jake Sisk

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF JAKE SISK**

9 I, Jake Sisk, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a Junior (Athletic Eligibility) at Liberty University and am a member of the
11 NCAA Division I men's Track and Field team. I am a member of the Injunctive Relief
12 Settlement Class and object both individually and on behalf of the class.

13 2. Being a Division One college athlete is a full time job in itself. I train 15 to 20
14 hours a week with the team and on my own. I then spend another 15 to 20 hours a week meal
15 prepping, reviewing educational pieces and meetings with coaches during that time on a weekly
16 basis. All of this over the course of years gave me the opportunity just to compete at the Division
17 One level. it took to have the chance of being a Division I college athlete; also include sacrifices,
18 having to miss other activities or social events]

19 3. I was a state qualifier in high school, and played other sports that helped with my
20 fitness to contribute to running track and field in college at a Division One level. I've practiced
21 for thousands of hours to have the qualifying times to attract the interest of Division One coaches.
22 I have ran and tracked over 5000 miles just to get to this level. All of this is at a risk of being
23 taken away for no legitimate reason. This could potentially nullify years and years of training
24 not just for myself but many other athletes who have even better accolades than myself. I have
25 teammates that have ran over 18,000 miles just to be able to compete for a Division One team
26 and have the qualifying times to be recruited by our coaching staff. Just think about that for a
27 second. This is thousands of hours of training. The recruiting experience has been fantastic and
28 I have nothing but great things to say about Liberty University. The standard protocol is you run

1 a certain time to be eligible to run for the team. And you continue performing get better as the
2 years go on. Because of these potential roster cuts even though my times have been getting better,
3 there is no longer space for all the improvements I've made over the years and I may not have
4 the opportunity to run for my senior year of athletic eligibility which would be an even more
5 disheartening way to go out than being an athlete and missing out on a season because of the
6 pandemic as well. This would be the second time in five years or less that a season has been
7 stripped from US athletes. Our coach let us know that if we got better and continue to hit the
8 times that were required there would be space for us on the team. Now because of no fault of
9 their own this may no longer be possible. I turned down over a half a dozen schools for the dream
10 of being able to compete at Division One level. To have access to the best races and the best
11 competition is what a lot of Division One athletes strive for.

12 4. I learned about roster limits from our school's compliance center and then found
13 out about it on social media online. How sad is that? We have been told that more than 1/4 of
14 our roster will most likely be cut next year between men and women to make room for the new
15 roster cuts. This is also greatly impacted the ability to bring in new teammates and new freshmen
16 and high school athletes who would be our teammates next year. The morale has definitely
17 dipped because of all of the talk about cuts. It's very difficult to focus on a season when you
18 know that many of your teammates unfortunately will not be with you next year. It also creates
19 an unhealthy environment of competition because it's not healthy competition it's competing
20 against your own teammates for next year's spot before this year is even completed. The added
21 pressure to game day performances of now having to outperform your teammates for something
22 that is not affecting us this year is not a healthy way to compete. I have even seen teammates
23 just leave the team because they've been so dejected because they know that there is no chance
24 of them having a spot next year. There's no point in transferring schools after already having a
25 bunch of credits, and there is no point of competing and training for something that you know
26 will be taken away without the chance of you completing what many of my teammates went to
27 school here for. That has been sad to see a few of them leave after hearing the news

28 5. Absolutely. The stress in every capacity has been heightened because of the

1 financial burdens of coming to a school that can no longer satisfy the prerequisites from an
2 athletic perspective of why you picked the school you went to in the 1st place. I turned down
3 many schools personally, that were closer to home just so I can have the opportunity to run at a
4 Division One athletic program. It is very disheartening to many of us. This is a pivotal point in
5 our lives where making decisions that compound and are beneficial to our future self is
6 important. When a major event like this is presented to us at an age where we're learning what
7 we want to do with the rest of our lives leaves a negative impact on us. It's just one more thing
8 to think about on a daily basis. One more stressor.

9 6. I will lose access to the athletic academic health centers, new shoes that keep me
10 healthy when I run, free tutoring, academic counseling, access to athletic department cafeterias
11 which contains healthier food to keep me well nourished, access to treatments anytime I get
12 injured practicing or competing, team camaraderie, potential housing uncertainty for next year,
13 my purpose as an athlete, everybody I know at my new school since I transferred in this year is
14 on this track and field team. I came down to this school and I'm taking online classes and losing
15 access to my teammates while also being hundreds of miles away from my family would not be
16 good for my mental health. This is my first time living on my own and we are very social beings
17 period to remove a big aspect of our lives would leave a negative impact on not just myself but
18 many of my teammates who are all close with one another. 10s of thousands of dollars will be
19 wasted in transferring down here and taking out a student loan just for the opportunity to be a
20 Division One athlete. To have that taken away from me in my senior year would be disheartening
21 to say the least.

22 7. I'm considering having to drop out of school completely because I cannot transfer
23 to a third university without having to take out another student loan to make up for any credits
24 that don't transfer. There are no other spots at other schools as they have all moved on once I
25 picked my new university. I would have to stay at my current school away from my family
26 without access to any of my teammates and have to be cut from the roster. There's no point of
27 trying to continue in school after being stripped of the opportunity to compete, because I would
28 rather be closer to my family than to be down here alone. That will make all of the time money


1 and effort spent on transferring to my new school a drastic waste of my time. Which in turn will
2 leave a negative impact on my well-being, and I feel like many people would say the same thing
3 period it is like taking a job moving out away from your family spending thousands of dollars
4 on a space to live on getting acclimated at a new location only to be fired. The worst part about
5 this analogy is we can't even collect any compensation from this decision! My major is very
6 specific as it is a niche part of psychology that many schools don't offer, and a lot of my credits
7 would not transfer over. It will take me longer to graduate and more money, all while not being
8 able to compete in the sport I love and have spent thousands of hours and years training for. I
9 greatly hope you take the time to reconsider this and leave a lasting legacy on your career with
10 positive decision for us athletes. I pray that you reconsider the roster limits that the NCAA wants
11 to uphold.

12 8. I'm praying from the bottom of my heart that you would think about saving our
13 student athletes from the daunting possibility of roster limits next year and I hope that you
14 consider why we feel so strongly they shouldn't be allowed. This is our life and something we've
15 trained for for a really long time period and it would be a really sour way to end our career, many
16 of us athletes already have lost another year very recently because of the pandemic. To lose an
17 entire year in high school and now in college would be devastating to not only myself but many
18 athletes in college. We hope that you agree that they should not be allowed either. Thank you
19 and God bless. I declare under penalty of perjury that the foregoing is true and correct.

20 I declare under penalty of perjury that the foregoing is true and correct.

21 Dated: Lynchburg, Virginia

22 January 29, 2025

23
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25
26
27
28
Signed by:

830E396D4CE44E9...
Jake Sisk
NCAA ECID No. 2301753897
18 West Princeton Circle, Apt 28,
Lynchburg, Virginia 24503

Connor Michael Smith
17804 Crystal Preserve Dr.
Lutz, FL 33548

January 29, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Connor Michael Smith. I am a high school student aspiring to be a future Division I athlete, and a member of the Injunctive Relief Class. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Connor Michael Smith

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF CONNOR SMITH

I, Connor Smith, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a high school sophomore and swimmer, and hope to be recruited to compete on a Division I college team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. I practice approximately 20 hours per week which includes time in the pool and dryland activities. My dedication to the sport includes waking up at 4:40 each morning for practice before school and not arriving home until 7:00 pm in the evening after our afternoon practice. Swimming is a sport that a seasonal sport and in order to compete at the highest levels you must train all year long – I get only three weeks off per year (one in the spring and two in the summer). Swim meets are regularly 3 day long events on the weekends which drastically reduces the amount of time I am able to socialize with friends. I have also had to miss Homecoming the past two years as it was scheduled at the same time as High School States which took priority.

3. I've qualified for Florida Senior Championships since I was 13, USA Swimming Southern Zone Sectional Championships, Florida Swimming Open Water Zone Team, and Florida 1A High School State Championships.

4. I have not been able to fully start the recruiting process as coaches can not contact me until June 15, 2025 but I am concerned about the recently proposed roster limits as Men's Swimming is already extremely competitive from a recruiting standpoint due to the limited number of teams at colleges and universities.

1 5. I learned of the possible roster limits as my older sister recently went through the
2 recruiting process as a current high school senior. I also saw that if affected her friends with
3 offers being pulled after they had verbally committed to programs.

4 6. The possibility of not being able to continue swimming in college is very
5 stressful. I have swam competitively for over eight years and this is a major part of my life. My
6 goal since I was a small child was to follow in my mom's footsteps to swim for a D1 program
7 and with the proposed roster limits this might no longer be a possibility. Swimming is a sport
8 that has taught me to be disciplined in all areas of my life (e.g., training, diet), time management
9 skills and how to be good teammate.

10 7. The benefit of being a student athlete at any college or university varies but
11 typically includes priority selection on classes, tutoring assistance, possible financial aid and
12 assistance with admittance but it also provides you immediate friendships and a support system.

13 8. Swimming to me is so much more than just a sport. It's a part of my identity.
14 Swimming has taught me so much inside and outside the pool. I have learned to push past my
15 personal boundaries and been so much more successful than I ever thought possible. It has
16 instilled a tremendous work ethic and time management skills. The proposed roster limits
17 especially for Men's Swimming are extreme and will quickly kill the sport. Historically
18 swimmers have had some of the highest GPAs and highest graduation rates in the athletic
19 departments – they are the epitome of Student Athletes.

20 I declare under penalty of perjury that the foregoing is true and correct.

21 Dated: Tampa, FL

22 January 29, 2025

Signed by:



C003CAE4BA064FD...

Connor Michael Smith
NCAA ECID No. 2501503092
17804 Crystal Preserve Drive
Lutz, FL 33548

McKenna Ann Smith
17804 Crystal Preserve Dr.
Lutz, FL 33548

January 29, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is McKenna Ann Smith. I am a high school student aspiring to be a future Division I athlete, and a member of the Injunctive Relief Class. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
McKenna Ann Smith

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF MCKENNA SMITH

I, McKenna Smith, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a high school senior and swimmer, and have been recruited to compete on a Division I college team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. I sacrifice 20 hours of my time at 10 practices every week to have had the chance to be recruited to swim at the Division 1 level. I wake up hours before and get home hours after all of my classmates, and still take the same rigor and courseload of classes. My weekends could be filled with catching up on sleep, hanging out with my friends, or getting ahead in class, but chose to spend it at an all-day-long meet to achieve times that are enticing to colleges. I also rarely take breaks, as swim is not a seasonal sport, but rather an all-year-long endeavor.

3. I have time cuts for USA Swimming Futures and have qualified for finals in that meet. I have qualified for Florida Senior Championships since I was 12, Southern Zone Sections since I was 13, qualified to represent Florida on the All-star team, am a Florida Senior Champion, and medaled at one of the most competitive Florida high school states.

4. It was more difficult to obtain a roster spot on many teams, as this year was especially competitive due to the NCAA roster limits placed on many teams. I was looking for a school that I would be able to grow my swimming career at, but also prioritize academics. I have committed to swim at Davidson College, and have been promised minimal athletic scholarship for four years.

5. I have learned about the roster limits through the recruitment process and general

1 athletic news. I have many friends who are athletes looking to compete at the collegiate level
2 and have been undergoing the recruitment process. One of my friends in particular plays tennis
3 and was very interested in a Division 1 college. She was going to be offered a spot on the team
4 until the news of roster spots came out. The team then had room for only one incoming freshman
5 and they had already offered the spot to someone else. Now my friend will likely not play tennis
6 in college because she has had a similar experience at many other schools.

7 6. The possibility of the roster cuts added additional stress to an already stressful
8 process (i.e., recruiting) and finding a fit for both swimming and academics. I had to make my
9 decision during Hurricane Milton living in the Tampa Bay area as the college needed an answer
10 or my roster spot was going to be offered to another athlete. If the roster limits were not there I
11 would have had additional time and not stressed myself or my family out during an already
12 stressful time with a major hurricane directly impacting our home.

13 7. If I were to be cut from the team, I will lose my scholarship at this very expensive
14 institution and the benefits of having a separate athlete-academic counseling staff. In addition to
15 financials, swimming is where I have made some of my closest friends and my bond with my
16 siblings has grown immensely stronger. I have not started college yet, but I can imagine it will
17 be a similar situation. I will also lose the relationships with my teammates, which is essential
18 for college freshman, when they are still finding their way. Swimming has also shaped my life
19 over the past 8 years. It has taught me discipline, time management, and perseverance. Without
20 swimming, I will lose my schedule and decline on these learned skills.]

21 8. When I was going through the recruitment process, many schools have had to
22 decrease my recruitment class size in order to fit within the constraints of the roster limits. This
23 made the process harder, and limited my options to the point where if I wanted to attend an
24 academically rigorous college and be able to pursue my life-long passion of swimming, I had to
25 choose somewhere with an extremely expensive tuition.

26 9. I encourage the courts to fully look at the impact to all student athletes at all
27 levels. Placing these roster limits will force athletes to look at other programs and other levels
28 causing major downstream effects. I worry that my younger brothers won't be able to swim in

1 college as Men's Swim programs are few and far between as it is and this will drastically reduce
2 the number of spots available. Swimmers are historically found to have some of the highest
3 GPAs and graduation rates of the athletic department. Those student athletes are highly
4 employable as they have learned leadership, time management and team work skills through
5 athletics.

6 I declare under penalty of perjury that the foregoing is true and correct.

7 Dated: Tampa, FL

8 January 29, 2025

Signed by:



1E6A80D92383425...

McKenna Ann Smith

NCAA ECID No. 2211723941

17804 Crystal Preserve Dr.

Lutz, FL 33548

Ryan Smith
2353 Tuscany Avenue
Merced, CA 95340

January 12, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Ryan Smith. I am a current Division I athlete at University of the Pacific and my NCAA ECID number is 210199482. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
/s/ Ryan Smith

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF RYAN SMITH**

9 I, Ryan Smith, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a sophomore at the University of the Pacific, where I play on the Division I
11 men's water polo team. I am a member of the Injunctive Relief Class and object individually
12 and on behalf of the class.

13 2. I started playing water polo at age eight, and I knew very quickly that I wanted to
14 play in college. I started recruiting for water polo in high school. Getting recruited in water
15 polo is hard—there are not many programs. But in January of my senior year, I received a
16 commitment from the University of the Pacific to play on their water polo team as a preferred
17 walk-on, meaning that I would not receive an athletic scholarship but that I had a spot on the
18 team for my four years of college.

19 3. There isn't much scholarship money for water polo, and most of it is given to
20 international players. That means that the majority of my team is made up of preferred walk-
21 ons like me. I was thrilled to be able to play at the University of the Pacific and achieve my goal
22 of playing college water polo.

23 4. My team is very tight. In addition to maintaining full academic courseloads, we
24 train every day, some days twice. Our captains often organize events for us to hang out together
25 outside of practice, and I live with a group of my sophomore teammates. They are my closest
26 friends and have been a huge part of my college experience.

27 5. In mid-December, the coaches told us that roster limits might go into effect. My
28 coach told us that if the roster limits are approved in April, he will have to cut twelve players

1 from the team. He then took twelve players—including me—aside and told us that we would be
2 cut if the roster limits are approved. He said if the limits are not approved, he will not cut any
3 of us.

4 6. If the limits are approved and I am cut, I would want to transfer to another
5 program where I could play. There are only 27 Division I programs for men's water polo. Many
6 of these schools already have too many players, and they have also made commitments to
7 incoming freshmen. Dozens of water polo players like me will enter the transfer portal, but there
8 are simply not enough spots for all of us. I am worried that I will not be able to find another spot
9 and that I will have to give up playing water polo.

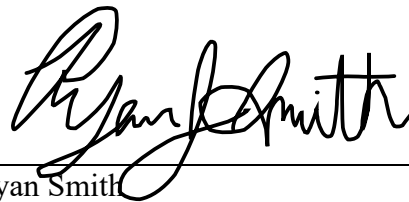
10 7. If I lose my roster spot, I also would be separated from my closest friends. Some
11 of my teammates will also likely try to leave if they are cut. This would have a big impact on
12 my support network and on my day-to-day life.

13 8. These limits make no sense and will negatively impact athletes' mental health.
14 We have all spent many years of our lives working toward college sports. It is not fair to us to
15 take away previously guaranteed roster spots after we have continued to work so hard.

16 9. In water polo, everyone knows that there isn't much money—for scholarships or
17 otherwise. We work towards Division I because we want to play the sport. No one is doing this
18 for money. We want more opportunities for people to play water polo in the U.S., not fewer.
19 These roster limits make no sense for sports like water polo. I hope you will not approve them.

20 I declare under penalty of perjury that the foregoing is true and correct.

21 Stockton, California
22 January 12, 2025



23
24 Ryan Smith
25 NCAA ECID No. 210199482
26 2353 Tuscany Avenue
27 Merced, CA 95340
28

Avery Stein
8000 Connerwood Lane
Fishers, IN 46038

January 25, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Avery Stein. I am a current Division I athlete at the University of Missouri and my NCAA ECID number is 2204519075. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Avery Stein

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF AVERY STEIN**

9 I, Avery Stein, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman swimmer at the University of Missouri (Mizzou), which is in the
11 Southeastern Conference (SEC). I am a member of the Injunctive Relief Settlement Class. I
12 object individually and on behalf of the class.

13 2. I started swimming competitively at 6 years old. I trained hard to make it to the
14 top of my sport when I was in high school. I knew I wanted to make it to a Division I swim
15 team.

16 3. My hard work paid off. I was a 4x High School All-American, 3x USA
17 Swimming Scholastic All-American, the 2024 recipient of the Indiana High School Athletics
18 Association Mental Attitude Award, and a Junior National qualifier.

19 4. The roster limits in the *House vs. NCAA* settlement were not in place when my
20 teammates and I went through recruiting and made the very intentional decision to compete for
21 the University of Missouri. As a freshman, I have only been able to train with my new team for
22 the past five months. With a sport like swimming, it can take up to a year to fully adapt to new
23 training conditions.

24 5. It's been a big adjustment to move away from home, embrace the challenges of
25 new training and new coaching, and do all of that with a positive attitude and full trust in a new
26 process. I was determined to take on these anticipated challenges in the pool, while also being
27 a dedicated student in the classroom. I am fortunate to have earned a 4.0 GPA in my first
28 semester. I am not alone: 16 women and 3 men on the swim team also earned 4.0 GPAs. We

1 take academics seriously and have excellent support from our athletic department.

2 6. I know other athletes have spoken to the financial losses that may result from
3 roster cuts. I am fortunate in to say that is not my primary concern, though it would be tough to
4 lose my athletic scholarship, which covers a significant portion of tuition. I'd also lose access
5 to athlete dining and other perks that come with being a Mizzou athlete.

6 7. What's more important to me is the bigger picture, which seems to be ignored by
7 the proposed settlement. That is the cultural damage being done to all Division I athletic
8 programs *right now* in face of the looming reorganization efforts.

9 8. The primary reason I chose to be a student-athlete for Mizzou is the swim
10 program's culture of excellence. Head coach Andrew Grevers aims to develop the whole person,
11 not just the athlete. While it's important to me to be able to compete in the sport I love,
12 swimming will eventually come to an end. What will I carry with me into my adult and
13 professional life will be the memories of those who helped me achieve my goals.

14 9. When I was being recruited in high school, the other programs I was considering
15 were not as focused on whole-person success. When I made the decision to become a Mizzou
16 Tiger, I did so with the long term vision of being a proud and active swim and dive alumnus,
17 representing our "ZOU-style" values for the rest of my life.

18 10. I am concerned high quality athletic programs throughout the SEC will suffer
19 from this cultural standpoint. It can take decades to create a true culture of excellence. The
20 roster limits threaten to destroy what makes each of these programs special and replace their
21 long-standing traditions with short-sighted hyper-competitiveness overnight. The brand and
22 reputation of those athletic programs is being torn apart without reason, not to mention the lives
23 of hundreds of signed student-athletes whose college experiences will be ruined.

24 11. There is just one question for student-athletes in my position: Why jeopardize
25 the unmatched school spirit, tradition, and overall special experience of competing in the SEC
26 when a roll-out of the roster plan could ensure a successful transition for all?

27 12. Everyone involved in this situation is struggling. My fellow freshman teammates
28 have been on an emotional roller since the start of the Fall semester. No one is their best self

1 under these conditions. Our men's team in particular is struggling to stay positive. All of us are
2 suffering knowing these changes could have a significant impact on our team culture and our
3 college experience moving forward.

4 13. My coaching staff, as resilient as they are, is struggling knowing they may be
5 forced to crush many of their athletes' dreams. How is it fair to force them to flip this terrible
6 switch on the swim program they dedicated themselves to for years? Wouldn't a kinder approach
7 be to let the athletes under current contracts be permitted to honor their agreements and for their
8 colleges to honor them back?

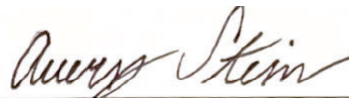
9 14. In just the past five months I have developed tremendous pride in being a Mizzou
10 Tiger. It's taken a lifetime of hard work and dedication to realize the dream of representing a
11 school like Mizzou. What my team values most is not what the program gives us financially,
12 but that we get to be part of an incredible organization that is much bigger than ourselves. Isn't
13 that connection and purpose what makes college athletics special?

14 15. Please consider this before you insist on imposing these abrupt roster limits. Give
15 us the chance to live out our dreams under the conditions we agreed upon before system-wide
16 damage is felt by every athlete in the SEC.

17 I declare under penalty of perjury that the foregoing is true and correct.

18 Dated: Columbia, Missouri

19 January 25, 2025



Avery Stein
NCAA ECID No. 2204519075
8000 Connerwood Lane
Fishers, IN 46038

Luke Stelmach
33 Goodale St.
West Boylston, MA 01583

January 15, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Luke Stelmach. I am a current Division I athlete at the University of Massachusetts, Lowell and my NCAA ECID number is 2104147412. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Luke Stelmach

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF LUKE STELMACH

I, Luke Stelmach, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. My name is Luke Stelmach, and I am a member of the track and field team for the University of Massachusetts Lowell. I am a member of the Injunctive Relief Settlement Class and object on behalf of the class.

2. As a senior, I have spent nearly 4 years training, competing, and spending a large percentage of my time with the team. I have been able to make connections with countless athletes, coaches, and athletic staff to the point that I don't feel like I am a part of a team, it is more of a family. The proposed roster limits would severely impact the family I have found in Lowell and would fundamentally change the dynamic of countless teams across the entire country. To be clear, I object to these roster limits. I don't believe they have any place in college track and field or will lead to any benefits for the programs.

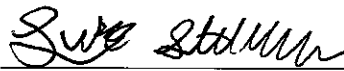
3. I came to Lowell in the fall of 2021 as a yearlong tryout. My situation is fairly common in Lowell, an athlete with potential upside that coaches are willing to take a chance on and develop. With help from the aforementioned coaches, teammates, and other staff, I have been able to progress as an athlete, student, and a person. I am a conference champion, team leader, team mentor and a Summa Cum Laude graduate working towards a master's degree. Without the original chance that the coaches took on me at UMASS Lowell, there is no possible way I would have developed into the adult I am today. If there was a limit of 45 athletes for my team, there is a high possibility I would never have gotten a chance and I probably would not be running collegiate track and field right now.

1 4. I believe that these frivolous roster limits would limit and potentially remove
2 stories like mine and so many other athletes that were given a chance. However, the impact of
3 roster limits goes beyond my own story. I know a great deal of athletes (teammates and
4 opponents) who made their team as a tryout or walk-on. Many of these competitors went on to
5 have successful careers, some have even exceeded their highly recruited opponents. However,
6 with the implementation of staunch roster limits, many of these stories would be nothing more
7 than what-ifs.

8 5. I believe the Lowell track and field team would not be the tight knit family it is
9 today and I don't think we would have had the success seen in recent years if we were bound to
10 a pointless roster limit. These roster limits should be reconsidered and I think there needs to be
11 some common sense injected into the conversation regarding this topic.

12 I declare under penalty of perjury that the foregoing is true and correct.

13 Dated: Lowell, Massachusetts
14 January 15, 2025



Luke Stelmach

NCAA ECID No. 2104147412
[Mailing Address]

33 Goodale St.

West Boylston, MA 01583

Katherine Stevenson
330 Sheffield Avenue,
Mill Valley, CA 94941

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Katherine Stevenson. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 2302777037. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Katherine Stevenson

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF KATHERINE STEVENSON**

9 I, Katherine Stevenson, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman at the University of Washington and am a member of the NCAA
11 Division I women's rowing team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 2. After rowing for four years, six days a week and over three hours a day, I
14 cannot even begin to count the amount of time that I dedicated towards achieving greatness
15 within the sport of rowing. This dedication came with many social, mental and emotions
16 sacrifices as well, from missing friends' birthday parties to missing family events and
17 graduations. I sacrificed my well-being, my relationships, and even my high school
18 experience in order to ensure my teammates and I did well. While I certainly don't regret
19 any of the sacrifices I have made, I wouldn't be telling the truth if I didn't speak on the
20 physical, mental and emotional toll training to become a Division I athlete has taken on me.

21 3. Throughout my high school rowing career, I qualified for San Diego Crew Classic
22 during my sophomore and senior years of high school by being the first novice 8 and 2V for
23 Marin Rowing. I was one of two of the team captains for the Marin Rowing Varsity Women my
24 senior year of high school and worked alongside them as we placed 7th in the Women's Youth
25 IV category for the Head of The Charles Regatta.

26 4. My experience with being recruited to row at the University of Washington was
27 a very personal decision I made to in order to show my gratitude and dedication to my family
28 and myself. Both of my parents came from very hard lives of abuse, abandonment, addiction,

1 and even suicide, so it's a big deal to me and my family for me to have the opportunity to row at
2 such a prestigious university and high-end rowing program.

3 5. A large percentage of my tuition was donated to me by my great aunt Mel – the
4 same woman who took my father and his siblings in after their mother (her sister) committed
5 suicide. I've been dedicated to rowing at the University of Washington for as long as I can in
6 order to honor her and my family's hard work and dedication. Whether we were eating off food
7 stamps or living with my grandparents, my family has always been there for me and has never
8 fallen short in showing their support of me in every way they can.

9 6. As for choosing to row at Washington, I remember being starstruck by the team's
10 passion towards their sport and rowing with each other. While on my official visit with the team
11 last February, I witnessed more passion and inclusivity in two practices than I would have seen
12 in high school over two years. When I committed to Washington, I was promised unconditional
13 love and commitment as long as I gave the same to my teammates.

14 7. I had heard about the possibility of roster limits but was unaware of the extent of
15 them until I learned about them from my head coach, Yazmin Farooq.

16 8. The possibility of being cut has taken a huge toll on the team. Discussions about
17 the cuts have sparked new anxieties amongst us, along with questions and fears that develop
18 every day about what the future of Washington rowing may look like. All of the women on our
19 team, whether they are Olympic medalists or first year novices, have earned the right to be here
20 and represent the legacy of both Title IX and the University of Washington.

21 9. If I get cut, I will lose everything that represents me and has helped me become
22 the person I am today. I cannot afford to lose the precious resources that being on this team has
23 provided me. Those resources include a community that shows love and appreciation, a cafeteria
24 that provides nutritional food, academic resources that enrich my learning, a campus that I feel
25 safe on, and disability resources to ensure I have a chance at excelling both on and off campus.

26 10. The possibility of being cut due to the roster limits has also forced me to
27 reconsider my future. Do I enter the transfer portal with no guarantee of a chance to compete
28 next year, as well as the possibility of reduced academic quality? Do I go back home? Do I stay

1 at the University of Washington and lose my chance to compete entirely? The decision I have to
2 make is incredibly overwhelming, especially due to the fact that the proposed December 1
3 timeline is so impractically timed, especially because it is before final exams and too late to
4 ensure I am able to change schools.

5 11. Not only are the roster limits unfortunate for certain teams, but they also serve as
6 a symbol of the reality that is women's sports and how they are treated. There are girls around
7 the world that are inspired by the legacy of the University of Washington's women's rowing
8 team. How would those girls feel if they found out that their beloved inspiration was being cut
9 in half due to the unjust laws of athletics? Washington thrives due to its large roster size. It
10 encourages and accepts women from all around the world with all types of skills. Whether they
11 have been rowing for a month or a decade, everyone deserves enough time to grow and advance.
12 I urge you to consider all of the complications that these roster limits will cause.

13
14 I declare under penalty of perjury that the foregoing is true and correct.

15 Dated: Seattle, Washington
16 January 26, 2025


Katherine Stevenson
NCAA ECID No. 2302777037
330 Sheffield Avenue
Mill Valley, CA 94941

Sydney Stewart
17804 33rd Pl W
Lynnwood, WA, 98037

January 24, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Sydney Stewart. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 2404279818. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Sydney Stewart

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW
Hon. Claudia Wilken

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7
8 **DECLARATION OF SYDNEY STEWART**

9 I, Sydney Stewart, hereby declare as follows pursuant to 28 U.S.C. §1746:

10 I am a Freshman at the University of Washington and I am a member of the NCAA
11 Division I women's rowing team. I am a member of the Injunctive Relief Settlement Class and
12 object both individually and on behalf of the class.

13 In order to be given the chance to become a Division I college athlete, I had to work all
14 throughout high school to become the best version of myself. I played multiple sports as well
15 as participated in multiple extra curricular activities just to prove to colleges that I could not
16 only balance a challenging academic life, but also have time to prove how strong of an athlete I
17 could be. For multiple years of high school, this meant not having a job after school, due to
18 prioritizing my athletic journey. I had to pass up on multiple opportunities to earn money I
19 could've used, as well as pass on social events with my friends and at my school, since I had
20 practice every day and saw that as my number 1 priority.

21 I was noticed by the University of Washington by a former alumni who my dad met
22 through his work. My dad connected me to her and when I met up with her, she saw the
23 potential in me through hearing about my athletic journey. I was on my high school swim team
24 for 3 years, and still managed to get the 2nd fastest time on the team in the 50 freestyle after
having had 3 knee surgeries. I also had been weight lifting for 3 years, every day after school, 6

1 days a week. Training every day and working on my strength as well as endurance in multiple
2 sports is what gave everyone the confidence that I could go on to be a Division I athlete. I had
3 3 reconstructive knee surgeries my first 3 years of high school, and after each one of them, I
4 could've given up completely on sports. I was set back so many times and forced to start over
5 on numerous occasions, however each time it happened, I ignored all the signs telling me to
6 give up. I knew from the beginning that I was supposed to be an athlete, and no matter what
7 happened to me or what my body went through, I kept the promise to myself to always be the
8 best I could be, which is still true today.

9 My recruiting experience was unique because I was able to get into the University of
10 Washington due to my commitment to the rowing team. After having a meeting with a former
11 alum, she reached out to the coaches on my behalf, and I was invited to come to a morning
12 practice the following week. After attending that practice, the Freshman team coach formally
13 asked me to join their roster for the next school year. At the time, I had been waitlisted at the
14 University of Washington, but thanks to our rowing coaches, I was given the opportunity to
15 attend my dream school, as well as carry on my athletic journey I had been preparing for for
16 years prior. Before committing to the rowing team, I was planning on attending another school
17 in Washington, but didn't really know what my future held. I had dreamed of attending the
18 University of Washington for years and always expected that to become my reality, but when I
19 got waitlisted, I didn't know what to do. I felt as though my future was ruined and I didn't see
20 any hope until I found rowing. When I joined this team, I was told that this would be my future
21 for the next 4 years; that I would get to compete my whole time at this school and would be
22 part of an incredible legacy of women, something that now is at risk.

23 I found out about the roster limits from our varsity coach very recently. We were
24 informed that in December of this year, only 3 months into our next season, our roster will be

1 limited to 68 women. Our incredible team at the University of Washington currently holds over
2 100 powerful women who are now being forced to question what they're going to do. If these
3 cuts happen, dozens of strong women with so much potential are going to be forced to leave
4 their sport, not out of a lack of skill, but simply because the team can no longer hold them.
5 Dozens of women who worked for years to become as strong as they could be, who worked
6 every day for hours in order to prove themselves worthy, are going to have that stripped away
7 from them with total disregard of how that will impact them. Our sport is not something you
8 can see the potential in after only 3 months. Women's rowing is a sport that invites women of
9 all rowing experience to join a team of strong female leaders to become part of a legacy that is
10 truly inspiring. The walk-ons of next year's Freshman team will have no chance of becoming
11 their best by the time cuts happen. 3 months into a sport you've never played is simply not
12 enough time to show how good you can be. I was a walk-on to this year's team, and if these
13 cuts had been forced to happen this season, I would not be where I am now. Rowing is a sport
14 that takes time and precision no matter your experience, and to force our roster down to 68 is
15 simply insane. Our head varsity coach stated to us that she was a walk-on, and if these cuts had
16 been occurring when she was a Freshman, she would've been cut from the team. If that doesn't
17 prove that this sport is about time and precision, then I'm not sure what will. It takes time for a
18 rower to hone in on their skills and go on to win competitions, and if you don't allow an athlete
19 time to succeed, there is no possible chance in having a strong team. Majority of the people
20 from our women's rowing team who go on to join the Olympics were walk-ons. These are
21 athletes who have more potential and athletic ability than anyone you'll ever meet, but if
22 they're not given a chance, so many future legends in women's sports will be lost.

23 This pending decision has harmed every single person on our team. During our meeting
24 about the bill that may be passed, multiple of our teammates were crying, thinking about what

1 they would do if this were to become a reality. So many people have worked their entire lives
2 for a sport, and to all of a sudden say that those people are going to be cut from their lifelong
3 dream is unforgiving. Students who chose to come to a school in order to play their sport,
4 students who can't afford school without help from their sport, students whose mental health
5 simply relies on them playing their sport, quite literally any situation you can think of is a
6 reality for somebody. Division I athletes and the skills they possess is a rarity, and to take that
7 for granted is insulting. Instead of focusing on our future in our sport and what we could
8 accomplish and prove this next season, now all our team can think about is what's going to
9 happen to so many of us who have worked so hard to be where we are.

10 If I get cut next year, I will lose everything I've worked so hard for. I've made my
11 closest friends at college from this team, I've gained access to a much needed therapist as well
12 as nutritionist from this team, I get to eat at our athletic dining hall which helps save my family
13 so much money on food, etc. I also am able to save my parents thousands of dollars in medical
14 insurance because I get to attend physical therapy through the University thanks to being on a
15 sports team here. Because of my past knee issues, I still have to attend physical therapy
16 multiple times a week, and already this season I've had to get a small procedure done as well
17 as an x-ray which thanks to being on an athletic team, I didn't have to pay for right out of my
18 own wallet. I've never known my life without being an athlete, and I'm not at all ready to lose
19 something that precious to me. So much of my purpose and identity revolves around sports and
20 to threaten to take that away from thousands of students across the country shouldn't be
21 allowed to happen.

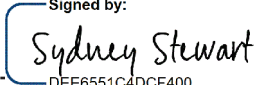
22 With the discussion of roster limits happening, I've had to think about what my future
23 could look like. Many people are having to consider transferring, but for myself personally, I
24 don't think I could take the toll of transferring to another school, and if I were to transfer

1 somewhere out of state, I'm not ready to pay the money to attend an out of state school. This
2 would mean I would stay at the University of Washington but no longer get to compete and be
3 a part of the women's rowing team. I would have to stay and earn my degree, but with that, a
4 large portion of who I am and what is most important to me would be lost. Many of my closest
5 friends I've made from this team also are being forced to weigh their options. I have a very
6 close friend who doesn't think she can afford to stay at this school without being on the team,
7 and that's a very common trend that multiple people are dealing with which is truly
8 heartbreaking after thousands of people have been promised a spot and an opportunity.

9 I truly believe that these roster limits are going to harm thousands of students across the
10 country. These cuts shouldn't be allowed to happen due to the amount of tremendous athletes
11 that will be lost due to this bill passing. Some of the best athletes of our time wouldn't have
12 made it to where they are if these cuts had happened earlier, and we can't let these cuts happen
13 now and impact the future of athletics. So many athletes' dreams will be ruined with the
14 passing of this bill, mine included, and I beg that the court take all of our sides into
15 consideration. These roster limits will impact all of us astronomically more than you think they
16 will, and athletes like me who rely on their sports so heavily will simply be at a loss for what to
17 do.

18 I declare under penalty of perjury that the foregoing is true and correct.

19 Dated: Seattle, Washington
20 January²⁴, 2025

Signed by:

DEE6551C4DCF400...
Sydney Stewart
NCAA ECID No. 2404279818
17804 33rd Pl W
Lynnwood WA, 98037

Tristan Stine
6612 Mitra Drive
Austin, TX 78739

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Tristan Stine. I am a high school student aspiring to be a future Division I athlete, and a member of the Injunctive Relief Class. My NCAA ECID number is 2401196271. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Tristan Stine

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF TRISTAN STINE

I, Tristan Stine, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am tennis player and a high school senior at Austin Tennis Academy College Prep in Austin, Texas. I am a member of the Injunctive Relief Settlement Class and object on behalf of the class.

2. I have been a competitive tennis player since I was nine years old. I love the sport, and I'm dedicated to improving. I consistently compete at some of the top youth tennis tournaments in the country. In the last couple of years, I placed first and won the "Gold Ball" award for the U16 Boy's doubles competition with the United States Tennis Association, won second place in doubles at Clay Court Nationals, and placed third in the Boys U18 doubles division at USTA nationals.

3. During the summer prior to my junior year, I started to receive some attention from college recruiters. By December of that year, I was getting significant attention from a number of tennis programs, including an invitation to visit LSU. I was excited about the possibility of continuing my tennis career in a Division I program and continuing to improve once in college.

4. I ultimately received and accepted an offer to play tennis at LSU. I was promised a roster spot for four years and the chance to work my way up. If I reached number one or two on the team, I could even earn a full scholarship.

5. Last fall, the LSU coach informed me that if the roster limits were to come into effect, he would have to prioritize the older, more experienced international recruits. Because

1 the roster limit is set at only nine slots for tennis, I might lose my offer to join LSU's program.

2 6. I know of several other college hopeful tennis players facing similar issues as a
3 result of the settlement agreement. Before the roster limits, Division I teams tended to have
4 about 14 players, so the opportunities for recruitment are already very competitive. Now many
5 more highly competitive players will be shut out of the opportunity to play Division I tennis.

6 7. Because I accepted LSU's offer to join their tennis team, I didn't think I needed
7 to apply to other colleges. Since I may lose my offer at LSU, I've had to try to play catch up in
8 my college search, and I feel very behind. I missed the early application period for a number of
9 schools I was interested in. I have a strong academic record, but the accelerated timeline of this
10 decision may still affect my final college choices. If I had known about the threat of roster limits
11 earlier, I would have adjusted my plans significantly.

12 8. The roster limits will prejudice my graduating class, and the high school class of
13 2026, in particular. College players who are cut will look for opportunities at less competitive
14 programs, leading to a new round of cuts at those programs and so on. This would significantly
15 reduce the number of players recruited out of high school. I believe this could cascade and leave
16 no roster spots available for members of the class 2026.

17 9. I am also worried about the impact that reduced roster sizes will have on a team's
18 ability to deal with injuries. Typically, a team will only have three bench players on reserve at a
19 tournament. Tennis is a demanding sport that leads to injuries all the time. If there aren't enough
20 players to step up in the event of injuries, teams will end up having to forfeit matches or the
21 players will have even more pressure to play injured.

22 10. The NCAA is supposed to protect student-athletes like me and says that it
23 prioritizes the whole athlete. The roster limits go against that mission and should not be
24 approved.
25
26
27
28

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Travis County, Maryland
January 26, 2025

Signed by:

Tristan Stine

FDE24841F66246A...

Tristan Stine

NCAA ECID No. 2401196271

6612 Mitra Drive

Austin, TX 78739

Aleena Stukus
11134 Robert Carter Road
Fairfax Station, VA 22039

January 21 , 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Aleena Stukus. I am a current Division I athlete at Virginia Tech and my NCAA ECID number is 2206588162. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Aleena Stukus



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

**IN RE COLLEGIATE ATHLETE NIL
LITIGATION**

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF ALEENA STUKUS

I, Aleena Stukus, hereby declare as follows pursuant to 28 U.S.C. §1746:

1. I am a freshman swimmer at Virginia Tech. I am a member of the Injunctive Relief Class. I object individually and on behalf of the class.

2. I began swimming competitively at the age of 6. I have always been competitive with myself, and I pushed myself all through middle and high school to get better and better at my sport. I was on my high school swim team at Robinson Secondary School, where I helped the team become runner-up state champions my senior year. I achieved Summer and Winter junior championship cuts in 2023 and numerous Spring and Summer championship Next College Student Athlete (NCSA) times. I also qualified for the Virginia Class 6 state championship in multiple events every year since 8th grade, and I was the district champion for multiple years.

3. I had gotten good, but I wanted to be even better. I knew the only way to do that was to compete at a higher level in college, in a competitive swim program that could push me even further.

4. I received a lot of interest from Division I swim teams during the summer after my sophomore year of high school. Throughout the recruiting process, I spoke to around 50

1 schools and visited many of them. Although I didn't leave anything to chance and made sure
2 to look at every possible swim program I'd be alright with, my heart was set on Virginia Tech.
3 It is a famously competitive program, and exactly what I wanted to get me to the next level.

4 5. One school offered me academic and athletic scholarships to join their team. It
5 was a tempting offer, but when Virginia Tech offered me a spot without any scholarships, I was
6 torn, but Virginia Tech won out eventually. Even without a scholarship, I turned down the
7 other school and chose Virginia Tech because I wanted to be on a team where I would be
8 challenged and would grow as an athlete.

9 6. Virginia Tech also has a research focused neuroscience program, which not
10 many other schools have. Since I want to go into medicine after college, I wanted to swim at a
11 school that was competitive both athletically and academically in my area of interest.

12 7. Before committing to Virginia Tech, I spoke to coaches and other swimmers
13 about their program. They told me that they do not cut athletes for injuries or poor
14 performance, and that the program was very well-rounded and supportive overall.

15 8. I was so excited to begin my freshman year at Virginia Tech in Fall 2024. But
16 then, just two days before classes began, I had a terrible accident. I was hit by a car and
17 suffered a concussion. I missed the first month of training and have been experiencing
18 post-concussion symptoms ever since.

19 9. Fortunately, the school and the team were very supportive throughout my
20 recovery process. I am offered daily concussion screenings, meetings with the team doctor and
21 sports psychologist, and tutoring. The school's support was extremely helpful mentally and
22 physically. It was also a lifesaver financially, because the team covered most of the medical
23 costs of my recovery.

24 10. My race times are not yet what they were before the accident, but since I was

1 cleared to return to training after the accident, I pushed myself. It was extremely difficult to
2 fight through daily headaches resulting from the concussion. Still, I downplayed my symptoms
3 because it is in my nature to push past the pain. I believe I am on track to a full recovery, but I
4 am not there yet.

5 11. There is only so much I can do to ignore my continuing symptoms, however.
6 Recently, at a meet, I pushed myself to the brink to swim at my best, but ultimately could not
7 compete because outside stimuli like strobe lights and loud music triggered my neurological
8 symptoms.

9 12. Then, our coach told the team about the roster limits for the first time. Because
10 we had too more girls on the team than the limit for swimming, the coach told us the school
11 would need to cut 5-6 of us. We were all shell-shocked. The coaches said that they will not be
12 making that decision until April and will be prioritizing character over swim times, but that
13 didn't resolve my fear and anxiety.

14 13. I am worried that due to my injury, character-based assessment or not, I could
15 be on the chopping block. I've been so stressed ever since. The roster limits have put a lot of
16 pressure on me and my teammates, which wouldn't be there if the limits weren't floating over
17 our heads. And we knew that the only reason this was happening to us was because of the
18 roster limits. Our coach said were it not for those, the coach wouldn't cut *anyone*.

19 14. All of us also feel strained about potentially losing our teammates next year.
20 We are all very close, so not being on the same team would be devastating. I have already
21 signed a lease with two of my teammates for next year, and one of the international students on
22 the team spent this past Thanksgiving with my family. Tearing us all apart when we were just
23 starting to build deep relationships with one another is especially cruel.

24 15. While I've thought about the transfer portal, it's not feasible for me. I wouldn't

1 be able to take advantage of Virginia Tech's neuroscience program at another school, even if I
2 could *find* another school with an open roster on their swim team who would take me.

3 16. Even more depressing, I know my injury will be an issue for me in the portal.
4 There are going to be many swimmers trying to land on their feet, and they won't have been hit
5 by a car recently.

6 17. The trauma of the accident is still reverberating in my life and in my head.
7 Given my condition, I don't feel like I can cognitively handle beginning yet another stressful
8 recruitment process all over again at this time.

9 18. I feel left behind though I didn't do anything wrong. If it weren't for the roster
10 limits, I could stay and recover with the team I chose, at the school I chose. The thought that I
11 am going to lose all that now because of the roster limits fills me with sadness.

12 19. It isn't fair. Please don't let the roster limits go through.

13 I declare under penalty of perjury that the foregoing is true and correct.

14 Dated: Blacksburg, Virginia

15 January 21, 2025



16 Aleena Stukus
17 NCAA ECID No. 2206588162
18 11134 Robert Carter Road
19 Fairfax Station, VA 22039
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21
22
23
24

Brayden Stukus
11134 Robert Carter Road
Fairfax Station, VA 22039

January 20, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Brayden Stukus. I am a current high school senior and sprinter. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,


Brayden Stukus

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION
6
7

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

8 **DECLARATION OF BRAYDEN STUKUS**

9 I, Brayden Stukus, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a 17-year-old high school senior, and a sprinter on my high school track and
11 field team. I live with my parents in Fairfax Station, Virginia. Aleena Stukus is my older sister
12 and a swimmer at Virginia Tech. I am a member of the Injunctive Relief Class, and I object
13 individually and on behalf of the class.

14 2. I played football as a cornerback all four years of high school and was team
15 captain my senior year. I initially took up sprinting in junior year of high school as a way to
16 build my speed during the off-season.

17 3. I found out I am good at sprinting, and more importantly, I enjoy it. I was fast—
18 and I knew if I continued training, I could get even faster.

19 4. I won recognition for my sprinting. I was All-District and All-Regionals. I made
20 the finals in regional and district competitions. A qualified for Virginia Class 6 state meet my
21 first season. My distance is the 100-meter, and my personal best is 10.9 seconds.

22 5. I knew by the end of my first year on the track team that I was fast enough to be
23 a Division I sprinter, and that became my goal for college. My times already make me very
24 competitive as a freshman for many Division I track and field programs. I improved so much in
25 just a year, and I know with the right college program I would get even better. As a senior, am
26 running indoor track for the first time and anchored my 4 X 200 relay team to a national
27 qualifying time.

28 6. I also want to pursue a career in engineering after college, so it was important that

1 the college I attend have a strong academic program as well. I have good grades in high school.
2 My GPA is 3.85, and I was nominated for National Honors Society. With my race times and
3 academics, I should be able to be recruited to a strong Division I track program at a good school.

4 7. The roster limits changed all that. I estimate that I reached out to about 50 schools
5 during my recruiting search since July 2024. *None of them* have a spot for me. I'm faster than
6 many of the runners who are currently on team at some of the schools I have been talking to, but
7 I am still finding that I have been completely shut out.

8 8. The coaches of the teams that showed the most interest in me told me that they
9 expect the roster limits in the *House v. NCAA* settlement will happen, so none of them have roster
10 spots. They said that if I were applying last year, I'd have no problem. Even after I applied and
11 got into schools that had shown a lot of interest in me, coaches told me that the rosters are full,
12 and I could not run track if I went there.

13 9. I don't understand how this happened. I have been conditioning for football for
14 years even before I ran track, and as soon as I applied myself to sprinting, I improved so much
15 in one year, and I should be a Division I sprinter based on my achievements. I have a lot more
16 potential, but I'm suddenly getting all the doors slammed in my face.

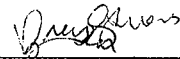
17 10. Taking a gap year is not realistic. I don't want to, and I shouldn't have to, delay
18 getting a bachelor's degree in engineering just because of the roster limits. And it would be a
19 challenge to maintain the training that I currently do to stay at, and improve on, my current times
20 for a whole year. It isn't fair that I might be asked to postpone my life because of something
21 that didn't exist a year ago while I was training to be a Division I sprinter.

22 11. The roster limits don't make sense and are unfair. Please don't approve them.
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1 I declare under penalty of perjury that the foregoing is true and correct.

2 Dated: Fairfax Station Virginia

3 January 20, 2025



Brayden Stukus
11134 Robert Carter Road
Fairfax Station, VA 22039

Chloe Swatts
707 Catamount Court
Chesapeake, VA 23322

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken,

My name is Chloe Swatts. I am a current Division I athlete at William & Mary; my NCAA ECID number is 2012982920. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,

Chloe Swatts

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF CHLOE SWATTS

I, Chloe Swatts, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a Sophomore at William & Mary and am a member of the NCAA Division I Men's and Women's Swim Team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. Our coaches have explained to us that roster limits, if implemented, will cause our team to incur and suffer from cuts of four of our teammates. We do not yet know if these will be athletes currently on our team, incoming freshmen, or a combination. We do not want this and feel we should not have to worry about losing teammates or have any concerns surrounding our own position on the team. Added stress does not help performance or team spirit. Nor will a limited roster benefit our team.

3. When I was a little girl my dream of swimming in college seemed larger than any other problem I had. As a high school athlete with one goal in mind, it caused me to make tremendous sacrifices with a 16-hour week practice schedule. I missed my senior prom so I could go train in Colorado in hopes of getting a little faster. Now, what I have been working for the last 15 years, my dream, has become a reality. We function as a team during our 20-hour practice schedule in and out of the pool. We eat together, study together, relax together, and live together; we have strong mentoring systems on our team and pride ourselves on helping one another in and out of the pool; we are a tight, supportive group. We worked incredibly hard throughout high school in order to have this opportunity; we all want to remain on this team and at our school, together. We do not feel roster limits help our team or our sport, but they will negatively

1 impact those who are cut and our team at large.

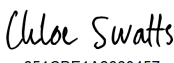
2 4. I was MVP and team captain of my high school swim team my senior year. I
3 placed top 3 in my events leading up to senior year in which I won the 200 freestyle at VISAA
4 State meet.

5 5. When I was looking for schools and talking with coaches, I was offered spots
6 from other Division 1 schools but chose William and Mary for the promise that I would be a part
7 of this team. I am extremely grateful for the opportunity my coaches gave me.

8 6. Imagine you hike Mount Everest. You train with your clan for years; what to do
9 when you run out of food, how to camp out at night, how to stay warm. You then embark on
10 your journey. You are doing the thing. It's very hard but you've been working on it for so long
11 and you are actually doing it. You will get to say you climbed Mount Everest. Then, they leave
12 you. Someone comes and says you have to get down. Well, I am on my climb right now. They're
13 telling me I might have to get down. Do I even keep on climbing? They tell me I can join another
14 clan. But I've spent the entire climb with these people. They know me. My team knows me. We
15 are not us without all 34 of us. I walk into practice every day wondering if these might be my
16 last few times. I am scared that the next meet will be my last one. At the dining hall when roster
17 cuts come up, we all shy away afraid it might be one of us. The eleven girls in my class aren't
18 us without one another. I am afraid to sign the lease for my new house with the unknown that I
19 might not be a part of this team next year. I don't wish this feeling upon anyone.

20 I declare under penalty of perjury that the foregoing is true and correct.

21
22 Dated: Williamsburg, VA
23 January 28, 2025

Signed by:

651CBE1A2660457...

Carly Swatts
NCAA ECID No. 2012982920
707 Catamount Ct.
Chesapeake, VA 23322

Giuliana Swatts
707 Catamount Ct.
Chesapeake, VA 23322

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Giuliana Swatts. I am a high school student aspiring to be a future Division I athlete, and a member of the Injunctive Relief Class. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Giuliana Swatts

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF GIULIANA SWATTS**

9 I, Giuliana Swatts, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a high school freshman and lacrosse player and I hope to be recruited to
11 compete on a Division I college team. I am a member of the Injunctive Relief Settlement Class
12 and object both individually and on behalf of the class.

13 2. In hopes of one day competing at the Division I level, I joined Coast VA Lacrosse
14 and have gone to every tournament and put my full effort into getting better at every opportunity.
15 These tournaments, practices, offseason clinics, and at home stickwork or wall ball has caused
16 me to miss out on a lot of the social aspects of being a high schooler. However, I am willing to
17 make the sacrifices in order to play at the collegiate level.

18 3. My sister is a swimmer at William and Mary. I watched my sister growing up
19 practicing at least fourteen hours a week year-round with her team in order to compete in
20 Division I which she has made it to but these roster cuts have been worrying for her future in
21 swimming. She sacrificed so much for swimming it is heartbreaking to see that all her hard work
22 may be ending not by her choice, but by the choice of the NCAA. She missed her senior prom
23 to go on a trip to the Olympic Training Center, missed countless social events because of practice
24 the next day, and missed out on family activities for swim meets.

25 4. I have just begun the recruiting process, although exciting, it is scary thinking
26 about my future past high school and what is to come. I live in Chesapeake which is not an area
27 where lacrosse is very popular, there are not many local club teams and it is hard to get elite
28 training. It is even harder competing at prospect days and tournaments with girls in northern

1 states who play for multiple teams and have all of these opportunities around in the area. With
2 this considered, it will already be extremely difficult to get to the Division I level, but roster cuts
3 are going to make it that much more difficult.

4 5. My sister has put in so much work on her current team as well. The roster cuts
5 may disrupt her academic and social life in the very near future. If she gets cut, her relationships
6 with her teammates, coaches, and other athletes will suffer as well as adding extra anxiety. These
7 cuts may also cause her to transfer schools leading to a possible delay in graduation and moving
8 farther away from family. In the recruiting process, she turned down other offers because she
9 felt that the William and Mary team and atmosphere was the best for her.

10 6. I respectfully urge the court to reconsider the roster limits imposed by the NCAA.
11 These cuts not only harm current athletes who have dedicated their lives to their sport but also
12 discourage aspiring athletes like me from pursuing our dreams. Division I athletics are built on
13 the principle of opportunity, and these roster limits undermine that foundation.

14 I declare under penalty of perjury that the foregoing is true and correct.

15 Dated: Chesapeake, Virginia

16 January 28, 2025



Giuliana Swatts
707 Catamount Ct.
Chesapeake, VA 23322

Abhay Tharakan
824 Haddon Hall Dr,
Apex, NC 27502

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Abhay Tharakan. I am a high school senior and swimmer. My NCAA ECID number is 2212746770. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Abhay Tharakan

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

4
5
6 **DECLARATION OF ABHAY THARAKAN**

7 I, Abhay Tharakan, hereby declare as follows pursuant to 28 U.S.C. §1746:

8 1. I am a high school senior and swimmer. Until recently, I had been recruited to
9 compete on the Georgia Institute of Technology (Georgia Tech) Division I swim team in 2025.
10 I am a member of the Injunctive Relief Settlement Class and object both individually and on
11 behalf of the class.

12 2. I began swimming competitively when I was just 8 years old. I knew I wanted to
13 swim on a Division I team since I was 12 years old.

14 3. Each day for the last 10 years of my life I have worked tirelessly at the pool. I
15 spend 20 hours each week on swim practice and dryland exercise. After swimming, I also work
16 hard at school to maintain good grades, with the hope of swimming at a Division 1 school. With
17 my commitments to swimming and school work, I have very limited time for social
18 activities.

19 4. I currently swim for Apex High School and my year-round swim club, the TAC
20 Titans, in North Carolina. I am a three-time USA Swimming Scholastic All-American. I am
21 primarily a backstroker, though I make sure to keep up my strength in other strokes as well. My
22 years of hard work and dedication paid off with U.S. Open qualifying times in the 100-meter and
23 200-meter backstroke. I also have Futures cuts in all distances of the fly, breaststroke, individual
24 medley (IM) and some freestyle events. I am proud of racing for my team and hold some team
25 records. In 2023 and 2024 I finished 1st in the 100 yard backstroke for my high school

1 Conference and Regional meets. I also finished in the top 5 at the State Championships in the
2 past two years.

3 5. My recruiting took place mostly during the summer of my sophomore year and
4 continued into the beginning of junior year. Recruiting was a long process and extremely stressful
5 for me. I spoke to countless coaches and spent hours researching schools that would be a good
6 fit for my goals. Every day in the summer consisted of going to practice and then coming home
7 and speaking to coaches. I want to study Industrial Engineering and that was my main criteria
8 while identifying the swim programs at D1 colleges. Finally, I decided to commit to Georgia
9 Tech in the fall of 2023 as it is the top engineering school for Industrial Engineering and it had a
10 competitive swim program. It was a no-brainer as it was a perfect fit for my future aspirations.
11 Georgia Tech also offered me annually a 25% scholarship with a \$6000 additional scholarship.

12 6. I verbally committed to Georgia Tech in November 2023. I was excited to join
13 the Yellow Jackets! As far as I was concerned, my search was over and I no longer needed to
14 research other schools or line up alternatives. Popular swimming news website SwimSwam
15 picked up the story of my commitment to Georgia Tech in May 2024: Sidney Zacharias,
16 *Backstroker Abhay Tharakan Hands Verbal to Georgia Tech (2025)*, SwimSwam (May 7, 2024),
17 <https://swimswam.com/backstroker-abhay-tharakan-hands-verbal-to-georgia-tech-2025/>.

18 7. At the time, there was no hint that NCAA or conference roster limits could
19 endanger my spot on the team. I remained committed to Georgia Tech for 11 months, never
20 considering that the rug could be pulled out from under me before I even stepped foot on campus.

21 8. I heard about the roster cuts in the summer of 2024 but was mostly unaffected. I
22 was improving and maintaining my swim times. Georgia Tech's team was not as big as other
23 college teams I had visited. My recruiting class consisted of 4 boys (which was a small number
24 compared to the 6-8 sizes most classes contain). I had regular phone calls with the coaching staff
25 at Georgia Tech and everything seemed to be going along as usual. Why would I have any need
26 to be worried about getting cut? I submitted my application to Georgia Tech on 20 Oct, ahead of
27 the Early Action 2 deadline, and waited for the signing letter which was to arrive before 13 Nov,
28 the National Signing Day for high school athletes.

1 9. On October 28, 2024, everything came to a screeching halt. Just before the
2 November 1 early admission application deadline for other competitive colleges, the Georgia
3 Tech interim head coach informed me that, due to proposed roster limits in the *House v. NCAA*
4 settlement, Georgia Tech no longer had a spot for me on the team. It was devastating news, and
5 it took me a long time to process. I couldn't believe that almost a year after I committed, and
6 arranged my life in reliance on that commitment, the school could just take away my spot.

7 10. I was so distressed that I missed the early admission deadline for other schools.
8 Realistically, I had no way of rallying in time to apply – after committing to Georgia Tech nearly
9 a year prior, I had no need to research other programs or pull together application materials. I
10 thought I was set and had no reason to believe that my spot was in jeopardy.

11 11. In November, I scrambled to reach out to other college coaches and prepare
12 materials for application deadlines in January 2025. About five or six other schools initially
13 expressed quite a bit of interest, and that was followed by the Division I-wide recruiting
14 shutdown in December. After the new year, most of the coaches of the swim programs that I was
15 interested in, got back to me saying that, because of the roster limits, they also did not have a
16 spot for me.

17 12. I am at a complete loss. I committed myself to the singular goal of making it on
18 a Division I swim team nearly my entire life, and I did. Then at the eleventh hour, it was ripped
19 away for no reason. Now I'm stuck. I'm going to graduate in the summer, and most Division I
20 schools have already filled their rosters. I feel like I am being punished for pursuing my dreams
21 and planning ahead. All I wanted to do was swim in college, but because of the roster limits,
22 that is looking more and more unlikely at this time.

23 13. Not fair” is an understatement. I feel completely abandoned. Not once, in the
24 history of College Sports, has something like this ever happened. It has completely affected my
25 future, and I have absolutely no control over it. It has added to the stress of all my athletic
26 performances as each race seems like a do or die situation to get into college. I don't know what
27 I will do for college at the moment.

1 14. From being cut I lost numerous things. I lost my college admission, I lost a
2 scholarship, I lost new friends and a community, I lost a top tier education, and I lost an incredible
3 swim program. I've been swimming competitively since I was 8 and this is the first time in those
4 10 years where I'm not sure if I will continue to swim after high school. My parents are lost as
5 well, they've sacrificed so much time, driving to and from practice, cooking meals for me,
6 cheering me on, making sure I'm the best I can be in the pool. All of their effort has been a waste
7 as well.

8 15. Roster limits are unfair, tens of thousands of athletes are being affected by them
9 and there is nothing that they can do about it. Legal or regulatory compliance requirements are
10 usually applied in a phased manner, over a few years if needed, giving the affected parties time
11 to make the required changes. First, implementing such drastic roster limits i.e., reducing a team
12 size from 35 to 22, may have result in teams with not enough competition within the team, and
13 burnout or injured athletes. Secondly, the roster limits or any legal compliance requirement
14 should not result in colleges not honoring their commitments to athletes like me and jeopardizing
15 our future.

16 I declare under penalty of perjury that the foregoing is true and correct.

17 Dated: Apex, North Carolina

18 January 26, 2025



19 Abhay Tharakan

20 NCAA ECID No. 2212746770

21 824 Haddon Hall Drive

22 Apex, NC 27502
23
24
25
26
27
28

Jackson Tuck
886 Thoreau Trail
Valparaiso, IN 46383

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Jackson Tuck. I am a current Division I athlete at Indiana University of Indianapolis and my NCAA ECID number is 2202428752. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Jackson Tuck

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF JACKSON TUCK**

9 I, Jackson Tuck, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a sophomore at Indiana University of Indianapolis and am a member of the
11 NCAA Division I men's Cross Country and Track team. I am a member of the Injunctive Relief
12 Settlement Class and object both individually and on behalf of the class.

13 2. To become a Division 1 athlete, I had to sacrifice countless activities such as time,
14 work, school, etc. While in high school, practice would run from 3:15 to 5:30 Monday through
15 Friday. On the weekends, it would go from 8:00 am to 10 am. I would practice roughly around
16 13 hours, and this didn't include the time I had to put in on my own. Due to this, it was difficult
17 to find jobs that were flexible enough for me to attend the practices. It also caused me to miss
18 school events when I had state for example. I did all of this in hopes of competing at the Division
19 1 level even though I knew it meant I would have to cut out my social life to make sure I was
20 getting the proper rest even if it meant going to bed around 10:00 pm on a Friday night before a
21 big meet all in hopes of being able to compete at the Division 1 level, which I was able to do but
22 is now being threatened.

23 3. I was a 4-x state competitor in cross country and 2 x competitor in track. I led my
24 team to a 9th-place finish at the state meet in my senior year of cross country. During my 4 years
25 at Chesterton High School, I ran the 4th fastest 1600m run with a time of 4:19.6 and 7th fastest
26 800m run with a time of 1:57.4 I was asked to run in the Indiana all-stars meet my senior year
27 for the 3200 as well, but unfortunately, I had a stress fracture at the time.

28 4. During my recruitment process, I was stressed about picking the right school that

1 would fit my career interests while also being a good fit to run. Had I known about this when I
2 was still deciding, I might have leaned towards a lower Division in the NCAA or even NAIA. I
3 chose IU Indy because of its history with the program as well as its Exercise Science program
4 and P.T school right on campus. I was promised 4 years of scholarship to help with my financial
5 aid and that it wouldn't be removed unless I was cut from the team or quit. Furthermore, I was
6 promised I wouldn't be cut as long as I did what was right and did what I was supposed to. Even
7 with injury, I was promised I wouldn't be cut from the team, and I have been dealing with the
8 aftermath of a stress fracture and tendinitis now in my hip region for almost 2 years. This
9 scholarship made this school one of the more affordable options for me. Due to this, I had to turn
10 down several offers and a couple were a little cheaper but because of this school's strong Pre-
11 P.T program, I decided that the reward was worth a couple more thousand dollars.

12 5. I learned about the roster limit this year, as a sophomore through Instagram. It
13 became a reality when the head coach gave the team a talk about the roster limit cuts. With IU
14 Indy being a part of the Horizon League, the cross-country roster limit was lowered to 17 and
15 the track team to 45. Those who weren't top 17 would be moved to the track team since our
16 school is strictly a distance program and has enough room not to cut anyone off completely.
17 However, when I first committed here, I was told I would compete for both Cross Country and
18 Track for the 4 years I was here. I am not sure what this means for my scholarship either as half
19 of it was for cross and the other half was for track. Due to my injury, I am not sure how my
20 future career will play out with whether or not I will be able to get healthy enough in time to
21 make the top 17.

22 6. This has caused me a lot of worry and anxiety. My injury already causes enough
23 anxiety as I haven't been able to race yet in college, but the risk of being cut has now ramped
24 that up. I am supposed to be healthy and run my way into the top 17 all in the next 7 months and
25 I am already behind my fellow sophomores, the freshman class, and the incoming recruits.
26 Besides the running aspect, it makes me wonder about whether or not I have to switch schools
27 if I lose my scholarship as that helps pay for a big chunk of my tuition. I am losing sleep as I am
28 already almost 2 years into the Exercise Science program here and the possibility of transferring

could potentially set me back with some credits maybe not transferring over.

7. If I am cut from the cross-country team, I lose the ability to see the athletic trainer during the fall and as an injury-prone athlete, that is a resource I need if I want to become successful. I also pose the risk of losing half my scholarship which I need for financial aid to pay for school. I also will lose medical insurance from the school during the fall so if I have to run on my own just to stay fit for track and get hurt, I will have to pay for anything and everything that occurs before track season. My identity is greatly shaped by the teammates I have, and I could potentially lose friendships if certain teammates are also cut and have to transfer schools to which I most likely wouldn't see them again. The team is like a family and breaking that up has negative emotional consequences.

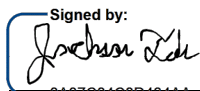
8. Due to this roster limit I am having to consider the possibility that I might have to transfer schools if half of my scholarship is revoked; otherwise, deal with the increase in my tuition somehow. Furthermore, with a lot of athletes being impacted the transfer portal will be quite competitive and with zero races under my belt, there is a low chance a team would pick me up, especially with my ongoing injury. As I mentioned before, if I were to transfer, some of my credits might not transfer and that will push back my graduation which means more money and time.

9. I am asking the court to take my experience as well as the countless others into account and how this affects us in more ways than just running for a team. Our identities are connected to this sport, the affordability of being able to still attend school is potentially going to be impacted, close friends could be lost, and a lot of confusion and fear has already taken place.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Indianapolis, IN

January 28, 2025

Signed by:


8A87C84C8D434A...

Jackson Tuck
 NCAA ECID No. 2202428752
 886 Thoreau Trail, Valparaiso, IN
 46383

MARIST VERES ROYAL
65 Spring Meadow Drive #65-4
Buffalo, NY 14221

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Marist Veres Royal. I am a Division I student-athlete beginning Fall 2025 at University at Buffalo and my NCAA ECID number is 2304842372. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,

A handwritten signature in black ink, appearing to read "MARIST VERES ROYAL", written in a cursive, stylized script.

Marist Veres Royal

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4
5 IN RE COLLEGIATE ATHLETE NIL
6 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

7
8
9 **DECLARATION OF MARIST VERES ROYAL**

10 I, Marist Veres Royal, hereby declare as follows pursuant to 28 U.S.C. §1746:

11 1. I am a high school senior and football player and have taken the extraordinary steps to
12 accelerate my graduation, obtain an early decision acceptance from University at Buffalo and
13 relocate with my family from the New York City area to Buffalo, New York, for the purpose of
14 competing on a Division I college team as a walk-on. I am a member of the Injunctive Relief
15 Settlement Class and object both individually and on behalf of the class.

16 1. Like many athletes, I have trained virtually my entire life, since age 7, to my
17 practice, to develop, and to compete year round for the chance of being a Division I college
18 athlete. My family and I have made many sacrifices during this journey including most recently,
19 foregoing my last two years of high school by graduating early in 2025 because of the fear that
20 this proposed settlement and the current transfer portal will close the door on opportunities for
21 me and high school athletes like me by 2027.

22 2. I have been recognized as a football athlete by achieving a rank #54 overall and
23 #11 for my position by Prep Redzone in the state of New Jersey in my freshman year. I was also
24 invited in 2023 and 2024 by the US Army National Combine Series in Frisco, Texas - being
25 selected from thousands of regional prospects across the country. As a 15 year-old 6'3" 250 lb
26 fullback and tight end, the hard work and sacrifice by me and my family had seemingly paid off.
27
28

1 This circumstance, however, puts that all in jeopardy.

2 3. That my family and I chose to act proactively in light of the NCAA changes,
3 including the transfer portal and this proposed settlement, I forwent the opportunity to engage
4 in the recruiting experience with my peers that I might have otherwise undergone. But before I
5 did, I had been contacted by coaches at Rutgers, Syracuse and Cornell universities via the X
6 platform. Ultimately, I chose the walk-on path at University at Buffalo because it is a great
7 program and one my family could afford to pay out-of-pocket for tuition and expenses. My
8 experience with the principal recruiter and admissions office has been very welcoming and I am,
9 as of today, looking forward to my walk-on tryout opportunity which is to occur this spring -
10 assuming this settlement will not prevent it. Many of the Buffalo's top players have been walk-
11 ons and have even received national awards and accolades, and I am confident I would be a
12 contributor to the team with my size and skillset. However, the risk of foregoing my high school
13 eligibility to enter University at Buffalo early and move to Buffalo to train for 6 months in
14 preparation of my walk-on opportunity, is a huge risk which would be devastating if roster limits
15 would prevent me, at this stage in the athletic process, of having that opportunity to join the
16 team.
17

18 4. I learned about the proposed roster limits on X in the fall of 2024 and have kept
19 up with the developments and reactions relating to it through social media and television. The
20 fear I have for me and many of the players from my former high school team at Saint Joseph
21 Regional in NJ – who like me have not only practiced and developed year round most of our
22 lives – is the economic loss our parents who have made significant financial commitments, and
23 often hardships, to ensure that we could attend the best schools to obtain D1 College
24 opportunities.
25

26 5. Even though many of my friends have received college offers for the year 2026,
27
28

1 many are fearful, like me, that they might not ever see those offers become a reality with two
2 headwinds now hitting them: older players from the transfer portal and the proposed roster limits
3 taking their opportunities away.

4 6. The mental stress of the possibility that I, like many of my former teammates,
5 may not get the opportunity to get to play in college is heightened for me as I took the chance to
6 step into the fire and actually come to college early. I know that many of my former teammates
7 are looking at my story to see if I did the right thing by acting and not reacting to the NCAA
8 changes, and all of this does take a mental toll on me; while also training and maintaining my
9 4.0 GPA. I also can't imagine how players at University at Buffalo must feel as I look at the
10 spring 2025 roster that is already above the 105 limit if you include the incoming 2005 fall
11 freshman and portal players who have just arrived on campus. That means that some of them
12 will for sure lose their roster spots. For me, what initially was a situation of me coming to
13 college to try-out as a walk-on for one of 125 spots, has now turned into me having to get on
14 the team by taking someone's spot in order to achieve my goal.

15 7. It would be devastating to not even have an opportunity to get on the team, as
16 uprooting my family to come to Buffalo was a very major undertaking. I would not be here if I
17 thought I could not make the team based on my talent, but at least that is something I can control.
18 It would not be right to deny me or other players the opportunity which we cannot control, and
19 for which no coaching staff I have ever seen on television or in the media has supportive of.
20

21 8. This whole issue of the transfer portal will have top-to-down domino effect, that
22 exacerbates realities of the proposed settlement. Even if I or other high school players have to
23 attend lower division schools in order to get an opportunity to play, we would still be competing
24 against more experienced players nation-wide who have been cut from their rosters as well. In
25 essence, high-school players will be the losers.
26
27
28

1 9. For the reasons stated above, I hope that the court in approving this settlement,
2 will do so in a way that is not in a vacuum and balance the burden that the transfer portal,
3 looming roster cuts, life-long development and financial commitments with the satisfactory
4 settlement of this case's impacting people that have no say in the outcome.

5
6 10. I believe a solution could be that a voluntary waiver could be signed by players
7 who fall above the 105 limit that their voluntary participation would not entitle them to whatever
8 monies are at stake in this settlement now or in the future.

9 I declare under penalty of perjury that the foregoing is true and correct.

10
11 Dated: Buffalo/Erie County, New York
12 January 28, 2025



Marist Veres Royal
NCAA ECID No. 2304842372
65 Spring Meadow Drive #65-4
Buffalo, NY 14221

Mary Kate Walker
130 Glennann Drive
Landenberg, PA 19350

January 11, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Mary Kate Walker. I am a current Division I athlete at Sacred Heart University and my NCAA ECID number is 2107277300. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Mary Kate Walker

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF MARY KATE WALKER**

9 I, Mary Kate Walker, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a freshman at Sacred Heart University (SHU), where I play on the Division
11 I women's soccer team. I am a member of the Injunctive Relief Class and I object individually
12 and on behalf of the class.

13 2. I started playing soccer when I was only three years old. I have dedicated
14 thousands of hours to soccer since then playing for school, club, and national programs.

15 3. Throughout my freshman and sophomore years of high school I spent hundreds
16 of hours researching schools, emailing college coaches, compiling highlight videos, and
17 attending recruiting clinics. SHU offered me a spot on their team during the fall of my junior
18 year of high school. The four-year letter of intent and athletic scholarship SHU offered were
19 crucial factors in my decision to commit there.

20 4. I first heard about the roster limits included in the House v. NCAA settlement
21 from an online source in approximately August – September 2024. To date, the settlement
22 proposal and roster limits have not been explicitly discussed with me by anyone at my school.
23 During my end-of-season player meeting in October 2024, my coach indicated that roster limits
24 may be imposed in the future. If this is the case, at least eight players will need to be cut from
25 our roster.

26 5. I tore my ACL during my senior year of high school. My recovery of skills and
27 stamina after the surgery and rehabilitation continued through the fall 2024 season. If the roster
28 limits go into effect, I am afraid I could be cut from the team because I was not able to perform

1 to pre-injury levels, redshirting my first season at SHU.

2 6. If I lose my roster spot, I could lose my athletic scholarship. My remaining
3 athletic scholarship is nearly \$140,000 and includes tuition, room and board. Without my
4 scholarship, I cannot afford to attend SHU. Although I love my school, I would have to transfer
5 to another institution. It is highly improbable that I would find a roster spot on another team at
6 such a late stage in the year, let alone a spot with a scholarship. Further, even as a 4.0 student,
7 my access to a quality institution would also be limited. Some of the schools I would potentially
8 be interested in considering require transfer student applications to be submitted prior to the
9 April 7, 2025 Final Fairness Hearing in this case and before I know whether the roster limits will
10 be implemented.

11 7. The proposed roster limits cause undue stress for me, my current teammates, and
12 my former club teammates now attending other schools. Due to injury recovery, I was unable to
13 prove myself this fall. Now, due to the proposed roster limits, my spot is in jeopardy because I
14 couldn't recover from my injury fast enough. Another teammate tore her ACL within five
15 minutes of her first collegiate appearance this fall. She is in the same position. We could be cut
16 simply because of our injuries. Others, who may not log many minutes on the field, are
17 nonetheless valuable and important components of our team. We all deserve the opportunity to
18 continue our college athletic careers. Nobody deserves to be cut, and without the roster limits,
19 nobody will be cut.

20 8. Imposing roster limits will force abrupt cuts and undermine the commitments
21 made to student-athletes, like me, who made 4-year decisions long before the House v. NCAA
22 settlement agreement was filed. The NCAA is supposed to protect student-athletes, prioritize the
23 whole athlete—including mental well-being—and ensure student-athletes can complete their
24 collegiate careers under the terms they agreed upon when signing. The roster limits are entirely
25 inconsistent with that mission and should not be approved.

26
27
28

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Dated: Chester County, Pennsylvania
3 January 11, 2025

Mary Kate Walker

Mary Kate Walker
NCAA ECID No. 2107277300
130 Glennann Drive
Landenberg, PA 19350

Margaret Ward
3217 Tallyho Ln
Madison WI 53705

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Margaret Ward. I am a current Division I athlete at University of Washington and my NCAA ECID number is 2311160202. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Margaret Ward

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION
6

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

7
8 **DECLARATION OF MARGARET WARD**

9 I, Margaret Ward, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a member of the class of 2028 at the University of Washington and a member
11 of the NCAA Division I women's rowing team. I am a member of the Injunctive Relief
12 Settlement Class and object both individually and on behalf of the class.

13 2. Becoming a Division I athlete is not easy, it takes grit, hard work, commitment,
14 time and energy. My junior year of high school I spent most of my free time outside of school,
15 alongside 3-hour practices every day, working on being recruited to be a Division I athlete. To
16 be successful at rowing you must constantly be doing it. I don't take breaks. In high school, I
17 would spend at least 14 hours a week at practice. I didn't mind because it was my outlet.

18 3. I achieved great results in high school that got me noticed by college coaches. I
19 was lucky enough to attend U.S. Rowing Youth Nationals in Sarasota twice and Head of the
20 Charles, the world's largest regatta, three times.

21 4. Visiting schools and my rowing schedule would often make me miss school and
22 social activities. I tell people getting recruited is like a job: constant outreach, rejection and
23 energy is spent figuring out where you want to go and who wants you. During my recruitment
24 process, I would find myself filling out questionnaires in class instead of doing my homework,
25 taking recruitment calls in my counselor's office, and making a ton of lists to decide where I
26 wanted to spend my next four years.

27 5. Like I mentioned above, recruiting is not easy. You must find a college that wants
28 you, and you also have to want them. When I was looking for schools, I was looking for a good

1 team environment, good coaches, resources, and also competitiveness. I chose the University of
2 Washington because they offered all of those things. Although I wasn't ground breakingly fast,
3 they still gave me an opportunity to be on this team and get better. That is what is so special
4 about UW: they give athletes like me time to develop and become extraordinary.

5 6. Development in rowing takes time. Teams like ours, who contend perennially
6 for conference and national titles, are made up of athletes who develop physically and technically
7 over four years. It's not unusual for a student athlete to learn and develop for a year or more
8 before competing in a conference or NCAA championship.

9 7. The roster cap could remove these student-athletes at a peak stage of development
10 and before they are able to compete at a conference or NCAA level. In my commitment letter
11 there are certain requirements/times I must hit in order to stay on the team. I was under the
12 impression that if I hit those requirements and continues to uphold the standards of being a
13 Woman of Washington, I would have a spot on this team. With the possibility of roster limits
14 this might not be the case.

15 8. I first heard about the roster limits through my teammates. At that point, no one
16 really knew what was going on, but there were lots of rumors about the cuts.

17 9. The potential cuts will greatly affect our team. Washington Women's Rowing has
18 roughly around 100 rowers currently. The new roster limit is 68, meaning 32 people will not
19 have a spot on the team if the cuts are approved. There are nearly 40 freshman this year; more
20 than half of use will have to be cut. Every person on the team will be affected by this—they will
21 either be cut or they will have to watch their teammates by cut. The team dynamic has already
22 changed because of the looming cuts.

23 10. This is taking a mental toll on me and all of my teammates. We are all worried
24 about our spots on the team. Every day feels like I have to prove myself and work even harder
25 to keep one of those 68 spots. It is driving all of us to be the best we can not because we want
26 to, but because we know we have to fight for our roster spots. Moral is really low and everyone
27 is stressed about what their futures look like.

28 11. Washington athletics provides me with so many resources. I will forever be

1 grateful for what they have given me. If I am cut, I would lose: my therapist, medical care, meal
2 plan, tutoring, academic counseling, and rowing. This amount of change makes it really difficult
3 to plan for the future.

4 12. Additionally, and most importantly, I would also lose my family. The women on
5 this team are inspiring and I am so lucky to get to practice and learn from them. This team makes
6 me a better person.

7 13. As a result of the roster limits, I have greatly considered entering the transfer
8 portal. One of my greatest concerns: will there be a spot for me at any schools? That I truly
9 don't know. I don't want this ruling to end my rowing career, but it might. Transferring is not
10 easy and would require me to restart the recruiting process. Transferring would uproot
11 everything. Finding a school with a good undergraduate social work program, which I am
12 planning on pursuing here at UW, would also be a challenge and I would have to reconsider
13 what I want to do academically. The timing of the proposed roster caps does not take student
14 athlete well-being into account. The December 1 roster cap date for spring sports is a terrible
15 time academically as all student athletes are preparing for final exams for fall quarter/fall
16 semester. The transfer portal opens in December, but because it opens after the roster cap
17 deadline, those who go into the portal will be going in at a time of lower demand, reducing their
18 options of competing that year.

19 14. I hope the court understands what the roster limits would do to me and thousands
20 of rowers and athletes all over the United States. Limiting rosters would ruin the careers of many
21 athletes and make sports more unethical.

22 I declare under penalty of perjury that the foregoing is true and correct.

23 Dated: Seattle, Washington

24 January 26, 2025



25
26 Margaret Ward
27 NCAA ECID No. 231116020
28 3217 Tallyho Lane
Madison, WI 53705

Emma Waters
5212 15th Ave NE
Seattle, WA 98105

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Emma Waters. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 2201424168. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Emma Waters

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

6
7
8 **DECLARATION OF EMMA WATERS**

9 I, Emma Waters hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a graduate student at the University of Washington and a member of the
11 NCAA Division I women's Rowing team. I am a member of the Injunctive Relief Settlement
12 Class and object both individually and on behalf of the class.

13 2. Originally from Ireland, I started rowing as a novice during my undergraduate
14 studies in late 2019 at the University of Galway. I had just turned 20 years old and was looking
15 for a pastime to keep active and maybe make a few friends. Within a few weeks of joining the
16 club, I knew I had found something special: a sport where I could express myself and a
17 community that supported me. I was hooked.

18 3. I trained day in and day out, trying to build my strength and learn the basics of
19 rowing on the water, looking forward to racing in the summer season. Unfortunately, that March,
20 the COVID-19 pandemic hit, and all training and racing were cancelled. This went on for two
21 years, which meant that while I was getting physically stronger on the erg/rowing machine, I
22 couldn't develop my skills on the water.

23 4. By 2022, I had finished my undergraduate degree, and rowing had become an
24 integral part of my lifestyle. A friend of mine mentioned that there might be an opportunity to
25 join a team in the US and study for a master's degree. So, I started reaching out to colleges. At
26 the time, I was physically very strong on the rowing machine but only had three racing events
27 under my belt and two years of eligibility left, so I knew it would be a gamble for a coach to take
28 me on. I was also limited financially, as I couldn't afford to fund myself in the US, even with a

1 partial scholarship.

2 5. Luckily, I received an offer to join the Rutgers Women's Rowing Team in New
3 Jersey. It was a good fit for me at the time. I developed quickly after joining the program; we
4 had great competition in the Big Ten and a packed racing schedule that gave me the opportunity
5 to improve in areas where I was lacking. With my development accelerating, I decided to take a
6 year out and try to get on the Rowing Ireland Women's Team that was gearing up for the Paris
7 Olympic Games. After trials that September, I made the training squad but wasn't selected for
8 the boat, which mainly came down to my lack of skill on the water.

9 6. Motivated to further develop my skills and having finished my degree at Rutgers,
10 I knew I wanted to move to a more competitive school program so I could surround myself with
11 athletes who had similar goals of competing in the Olympics. I reached out to my dream school,
12 the University of Washington, which agreed to take me on for my final year of eligibility.

13 7. Then, I received devastating news. Last week, our coach met with the entire team
14 to discuss the potential implementation of roster limits in women's rowing next year. This news
15 deeply resonated with me as I reflected on my rowing journey and realised how different my life
16 could have been if these limits had existed in 2022 when I finished my undergraduate degree.

17 8. Each program I joined at a U.S. university took a chance on me, and I know that
18 if roster limits had been in place, I might not have had the opportunity to be part of a team.
19 Additionally, the financial barrier to entry in rowing would have been insurmountable for me,
20 making it impossible to continue pursuing the sport at any level.

21 9. I am urging the Court to recognize that roster limits in NCAA women's rowing
22 will close the door for many women like me that have found rowing at a later age but have
23 desires to become the best in the world. I believe that these limits will damage the quality of our
24 sport, placing barriers to entry for athletes all around the world and will have lasting effects in
25 the future.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Dated: Seattle, WA

3 January 28, 2025

E Waters

4 Emma Waters
5 NCAA ECID No. 2201424168
6 5212 15th Ave NE
7 Seattle, WA 98105
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Caroline Wazac
465 Sunset Dr.
Fairfax, IA 52228

January 22, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Caroline Wazac. I am a high school senior and volleyball player. My NCAA ECID number is 2208635147. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Caroline Wazac

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF CAROLINE WAZAC

I, Caroline Wazac, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a high school senior who is committed to Wichita State University as a member of the NCAA Division I women's volleyball team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. I've been playing volleyball competitively since I was 10 years old. I've been to multiple national tournaments, having played at the highest levels, and have competed for and won many titles. I was on the varsity roster for three years of high school and have played club. It has been a year-round commitment. My parents have driven countless miles and spent thousands of dollars just to give me the opportunity to play at the college level. We haven't had a family vacation in years because of the sacrifices they've made for me. My goal was to play at the Division I level.

3. Like most high-level volleyball players, I'm very tall. It's unusual for a girl to be over six feet, but on the court, I fit right in. Dating is difficult because of my size, and I feel awkward and huge around my friends. But when I'm playing, I'm in my element. The sport gave me the opportunity to find a place where I feel at home. I'm not too big and I belong. It's also been the one place where I have excelled. I've broken a school record and I've been all-conference, all-metro, all-district, and all-state. I'm ranked 16th in my region and 2nd in my position. I'm also left-handed, which is a valuable trait in volleyball.

4. On June 15, 2023, I woke up to texts from schools all over the country. This was the first day that Division I schools could talk to me as a potential recruit. Some were big, others

1 small, but it was mostly mid-major and small Division 1 schools. My parents travelled around
2 the country so I could visit campuses, attend camps and talk to many coaches. Ultimately, I chose
3 Wichita State. I clicked with the coaches, and they have strong science programs along with
4 partnerships with a few dental schools (I want to be an orthodontist).

5 5. The decision was not easy. I was offered a walk on spot with the possibility of a
6 full scholarship my junior and senior years. I knew that it wasn't a guarantee, but I also know
7 how hard I work and that there was a good chance I could make it happen. My parents do not
8 want me tied down with student loans, so they've been putting as much money away as they can
9 so I could have the opportunity to go to my dream school and play volleyball. I could've taken
10 a spot where I'd have a full ride right away, but Wichita State was where I felt at home. The
11 Shockers have always carried a big roster and have their reasons for that, so roster limits are a
12 blow to the entire program.

13 6. My mom read about the roster limits in the news. She researched a lot about it,
14 but since Wichita State doesn't have a football team, it sounded like they didn't have to
15 participate. At first, we were confident that everything would be okay because we thought the
16 coach would let me know if something changed. Signing day came and I signed the paperwork
17 along with the rest of my recruiting class. In November, I got an email from the Athletic Director
18 that Wichita State would be participating in the settlement. Again, we assumed that if there was
19 an issue, my coach would let me know, so we still weren't worried.

20 7. When the portal opened, several players left, so I was feeling confident. That all
21 fell apart when new players were brought in from the portal. Between the current group and the
22 incoming freshmen, we are sitting at 26 for the fall. The proposed limit is 18. My mom pushed
23 me to reach out to the coach to ask if there will be cuts. I texted him and was told that he won't
24 know until April, but that if 18 is the number, 8 girls will have to be cut. I wasn't told if I'll be
25 one of them and we are hoping to talk to the coach soon. But, looking at the current roster, my
26 chances don't look good. I also think that the players who are cut from the big conferences will
27 end up at schools like WSU. No one is safe right now because they could get bumped by someone
28 who could be a little better.

1 8. This is extremely stressful. I thought this part of my future was planned. It's my
2 senior year and I'm supposed to be relaxing and enjoying my final year of high school.
3 Committing to a top mid-major made me feel like all the "no's" I've heard during my time in
4 this sport and all the years of being not quite good enough to be among the best of the best were
5 going to pay off. Now it's looking like I'm going to be told no yet again.

6 9. If I'm cut in April, I'm going to be scrambling to find a new college. My parents
7 took video clips for years to help prepare for recruiting and when I committed, they put the
8 camera down. We are trying to be proactive to find video to throw something together so that I
9 have something to show potential new coaches. There isn't much and what we've found is bad
10 quality. Even if I was able to put together video, I am not allowed to reach out to other coaches
11 since I'm signed.

12 10. Being a volleyball player is a big part of my identity. Although I'm a walk-on my
13 first year, there are financial benefits that I'll be losing. The academic support would be a benefit
14 for me when it comes time to apply to dental school. And learning health habits that would last
15 a lifetime. I'm sure there are many opportunities and financial benefits that I'm not aware of,
16 since I'm not there yet. I've worked hard for this and the thought of starting over is scary. Will
17 any school even want me? Will it be harder to get recruited this time since there are fewer spots?
18 If someone does want me, will I be pushing another player out of her spot?

19 11. Wichita is a 7-hour drive from home, so without volleyball, I don't have a reason
20 to go there and pay out of state tuition when I'm not going to be playing. I'd love to be able to
21 start reaching out to other schools now, but I can't do that unless I decommit on my own, which
22 I'm not willing to do. At this point, I have no idea what's next and it'll be a few months before
23 I know for sure. I've gotten to know my future teammates and forming those bonds somewhere
24 else in a shorter period is going to be hard.

25 12. Roster limits are wrong and unnecessary. Financial and emotional problems are
26 only a small part of it because from a recruiting standpoint, it is going to be a mess with thousands
27 of athletes suddenly becoming available. I'm asking the court to consider the athletes who aren't
28 worried about profit sharing- we just want to compete with the schools we committed to.

13. Roster limits will severely limit the opportunity for everyone, not just Division I athletes. One of the arguments for the limits is that top schools will hoard the best athletes. I guarantee there are very few of us who are willing to sit on a bench for a paycheck. We've worked too hard. So many of us are just happy for the opportunity to continue playing, scholarship or not. Don't take our dreams away. Let us play at the schools who want us to play there.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Fairfax, Iowa

January 22, 2025

Signed by:

Caroline Wazac

8633296E87F4440...

Caroline Wazac

NCAA ECID No. 2208635147

465 Sunset Dr.

Fairfax, IA 52228

Anzley Wevodau
P.O. Box 2865
Yelm, WA 98597

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Anzley Wevodau. I am a current Division I athlete at University of Washington and my NCAA ECID number is 2209679689. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Anzley Wevodau

1 **UNITED STATES DISTRICT COURT**
2 **NORTHERN DISTRICT OF CALIFORNIA**
3 **OAKLAND DIVISION**

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

7 **DECLARATION OF ANZLEY WEVODAU**

8 I, Anzley Wevoda, hereby declare as follows pursuant to 28 U.S.C. §1746:

9 1. I am a Sophomore at the University of Washington and am a member of the
10 NCAA Division I women's rowing team. I am a member of the Injunctive Relief Settlement
11 Class and object both individually and on behalf of the class.

12 2. Becoming a Division 1 athlete for the sport of rowing was my most unique life
13 experience to date. I am a true walk-on rower, so this meant that prior to September of 2023, I
14 had never had any rowing instruction. I trained cardio and weights around 20 hours per week, 6
15 days per week. My training was self-directed, as I did not live near any rowing teams. As the
16 only person from my community set to go Division 1 for the sport of rowing, I was forced to
17 be an individual. I often had to miss out on social events or extracurricular activities to devote
18 time to training. In addition, as a walk-on, I knew that my chances of earning athletic
19 scholarship in my early development years on the team would be minimal. I worked a
20 minimum wage job, 18 hours per week to generate savings to use in college. This time
21 commitment was in addition to my full training load and high achievement academic pursuits
22 as a highschool student and position as an ASB officer. I used my sports background having
23 been a varsity cross country and track and field athlete to grow myself further as an athlete in
24 preparation for joining the University of Washington NCAA Division 1 women's rowing team.

1 3. As a walk-on rower, my accomplishment as a multi-sport varsity athlete for my
2 high school was one of few accolades I could present to coaches. Through recruitment forms
3 and grassroots connections I was able to convey my affinity for sport, max lifts, and 5k cross
4 country times, as well as an unyielding commitment to the sport of rowing despite having
5 never done it before. I and my current coaches at the University of Washington took an equal
6 chance on each other with the opportunity presented. My team's ability to receive and develop
7 walk-on athletes alongside those more experienced is a remarkable display of equity. Without
8 my team's ability to front a full roster, myself and hundreds of other walk-ons over the years
9 would have been deprived of the experiences and benefits that sport at this level provides.

10 4. For recruitment to row at Washington, my initial introduction was through an
11 alumni rower of the women's team. I had met her brother and he shared with great reverence
12 and rapport of his sister's experience walking-on to the Washington rowing team, and assured
13 me that if I were to make my mind up to it, I could do the same. This claim was validated again
14 by his sister, the alumni Washington rower. She put me into contact with the recruit
15 first-contact and coaches at the University of Washington. As someone from a rural small town
16 in the state of Washington, the experience was both a fruition of everything I had ever worked
17 for, and excitement for all that I could look forward to in the 4 years to come. My
18 conversations and visits with the coaching staff were informative and inspiring. From every
19 interaction, the legacy, values, and aspirations of this team were at once exactly what I wanted
20 to cultivate within myself and elevate my peers to the highest level. Deciding to come to the
21 University of Washington to row as a true walk-on meant understanding the promise between
22 my team and myself. It was conveyed that by development of courage, grit, passion, and
23 perseverance I would have a place on my team. By continued dedication, humility,
24 compassion, and kindness, my teammates and I would continue to have the opportunity to

1 participate in our sport at the highest amateur level. This emphasis on values from all levels of
2 our team and sport is what makes it so important. My team's ability to front a roster of over
3 100 rowers spanning from international recruits, Olympians, experienced rowers, and walk-ons
4 sealed the deal for me. Coaches clearly conveyed the possibility of every athlete on our team's
5 potential to become an Olympian, with a large portion of Washington Rowing Olympic alumni
6 having begun the sport as a walk-on. This kind of elite development is a long term goal, and I
7 have full faith in my team and program to continue to uphold this legacy. This of course came
8 with the understanding that my peers and I might spend one to three years on the development
9 squad to have the chance to compete for conference and national title. Having turned down
10 multiple academic scholarships and admissions offers at other esteemed universities, I made
11 the decision to commit to row and expand my academic pursuits at the University of
12 Washington.

13 5. From my initial recruitment process, coaches and staff expressed the roster cap
14 for women's rowing at the University of Washington, with over 100 available spots, being
15 second only to football. This had been explained as a necessary measure to allow for every
16 individual athlete to develop themselves and contribute to their team at the highest amateur
17 level, while also attaining a degree in their desired field of interest. Having so many teammates
18 committed to elevating one another to be better students, better athletes, and better people is
19 truly inspiring. I had always known that cuts would be made when finalizing the roster;
20 coaches had communicated these cuts were not only performance based, but individual to an
21 athlete's development potential. However, with the current talk of diminishing our team's
22 roster by force of law rather than need or desire, I am concerned for any incoming
23 freshmen/transfers and current teammates' position on the team. The proposed roster cap would
24 diminish our team's number of athletes by nearly half. These numbers each represent a person

1 from every walk of life. Women's sports provide a place for all kinds of athletes to thrive,
2 whether they be women, girls, transgender, intersex, non-binary, etc. The benefits gained from
3 participating in sport at this level are intangible. No sum of money could outweigh what it
4 means to have the opportunity to participate in my sport surrounded by the 100+ athletes who
5 make it an experience worth having and living for. I want to secure the opportunity for
6 generations of women/people to participate in sport, even if they had never tried theirs before
7 college, at the highest amateur level and experience the same intangible benefits.

8 6. If cut from my team's roster, I would lose the completion of the greatest
9 opportunity presented to me. To include tangibles such as: tutoring, academic counseling, meal
10 plan, medical coverage and care, mental health resources, financial award opportunities,
11 housing leases, affiliated opportunities for advocacy and community outreach, and connection
12 to my support network. The quality friends and relationships gained from my participation on
13 my team thus far are unequivocally irreplaceable, an intangible of high value.

14 7. As a result of enforcement of proposed roster limits I am forced to consider
15 what it would mean to cease participation in my sport. My sport itself is not always accessible
16 at the recreational level, making its presence and breadth of support at the Division 1 level
17 even more prevalent. I do not wish to row for any other university, as I made a commitment to
18 my team and coaches with the intent of seeing it through. I decided on my university not
19 singularly as a student, not singularly as an athlete, but cohesively with the intent of being an
20 amateur student-athlete seeking both academic and technical education. The transfer portal is
21 out of the question due to: other schools having limited roster spots, legally binding housing
22 leases dated for the matriculated school year, extension of schooling required to fulfill degree,
23 and damage to well-being and relationship with myself and my teammates.

24 8. The proposed roster cap inadvertently seeks to marginalize women's sports not

1 even 54 years after the passage of Title IX of the Civil Rights Act. We, as a society still have a
2 long way to go when it comes to securing equity and equality for all. Women's sports are a
3 small step in a greater battle still in need of triumph. No action is without consequence, and I
4 urge consideration of every possible implication brought to the attention of those with power to
5 make change, protect, and guard those whom they are sworn to serve. As a current
6 non-scholarship student-athlete, my participation as a walk-on rower is purely amateur in every
7 regard. Amateur is defined as a person who engages in a pursuit, especially a sport, on an
8 unpaid rather than a professional basis. The word amateur comes from the Latin root *amare*,
9 meaning "to love," and that is why I and my teammates participate in our sport. I, like
10 hundreds of others, seek to compete at the highest amateur level because better athletes make
11 better people; better people make a better world. We love ourselves and each other and want to
12 thrive. When it comes to women, sport, and life, our strength is certainly found in numbers. In
13 looking toward the future, one constant remains: it is truly *all of us or none of us*. I urge the
14 court to consider carefully this declaration of myself and those of many others before making
15 their decision, and thank the court for their time and thoughtful consideration.

16 I declare under penalty of perjury that the foregoing is true and correct.

17 Dated: Seattle, Washington

18 January 26, 2025



Anzley Wevodau
NCAA ECID No. 2209679689
P.O. Box 2865
Yelm, WA 98597

Ryan Williams
PO Box 1638
Tahoe City, CA 96145

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Ryan Williams. I am a current Division I athlete at The University of Tennessee and my NCAA ECID number is 2005863755. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Ryan Williams

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF RYAN WILLIAMS**

9 I, Ryan Williams, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a Junior at the University of Tennessee and am a member of the NCAA Division I
11 men's Swim & Dive Team. I am a member of the Injunctive Relief Settlement Class and object
12 both individually and on behalf of the class.

13 2. I started swimming when I was five years old, and while I competed in other sports
14 growing up, swimming has been a constant for me throughout my life. As I moved up in age, I
15 began swimming year round typically training 11 months per year and an average of 11 hours
16 per week. Beyond the time in the pool, swimming is where I have made some of my closest
17 friends and has resulted in more memories than I can possibly list.

18 3. Throughout High School, my team won the Team Nevada State Championship twice and
19 I was a three time State Champion. I also achieved Junior National Time Standards, was awarded
20 Scholastic All American, and was recruited actively by many Division I programs throughout
21 my Senior Year.

22 4. I ended up taking official visits to 4 schools (The University of Arizona, LSU, SMU and
23 The University of Tennessee). Each school offered different unique opportunities but I felt like
24 I'd found a home when I visited The University of Tennessee. Throughout my official visit, I
25 was thoroughly impressed with the campus, athletic facilities, and resources available to student
26 athletes. More importantly, I felt a real connection with the coaches and team and was excited
27 to compete as a Vol! I was offered a small scholarship that was actually less than what I had
28

1 received from other schools, but the combination of Alston Funds along with Summer School
2 Scholarship Funds made The University of Tennessee still within range of what my family could
3 afford. I was promised that I would receive the same level of coaching and support as any athlete
4 within the program and that the University was committed to my success both in and out of the
5 pool throughout my four year tenure as a Student Athlete.

6 5. In the Fall of 2024, our team was informed by our coaches of the 22 person roster limit
7 being imposed by the SEC (despite the 30 person roster limit proposed as part of the House vs
8 NCAA Settlement). We were told that inevitably there would have to be some cuts to the team,
9 and since that time, some of my teammates have been advised that there would not be a spot for
10 them next year and that Alston Funds would not be rewarded starting in the Fall of 2025.

11 6. As of today, I have not yet been informed as to whether or not I will be impacted by the
12 proposed roster limits. If I were to be cut from the program, it would present a very difficult
13 financial position for my family. As an out of state student, the “all-in” cost to attend The
14 University of Tennessee is around \$52,000 per year. When taking into consideration my athletic
15 scholarship, Alston Funds awarded to Student Athletes, summer school scholarship and off
16 campus living stipend, access to athletic dining hall / meal plan, 100 % paid health care, access
17 to student athlete tutors and academic resources, my net cost to attend is currently around
18 \$32,000 per year. If I were to lose these funds, it could force me to have to transfer to another
19 University and possibly lose credits therefore costing me additional time and money needed to
20 complete my degree.

21 7. I respectfully request that the court remove roster limits from the House vs. NCAA
22 Settlement. At the very least, please consider “grandfathering” in existing Student Athletes
23 thereby making them exempt from roster limits and allowing for a reasonable transition period
24 that doesn’t disrupt their current educational tract.
25
26
27
28

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Dated: Knoxville/Knox County, TN

3 January 26, 2025

4 

5 Ryan Williams
6 NCAA ECID No. 2005863755
7 PO Box 1638
8 Tahoe City, CA 96145

Carson Wright
10725 W. Central Ave.
Wichita, KS 67212

January 17, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Carson Wright. I am a current Division I golf athlete and my NCAA ECID number is 2201425903. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Carson Wright

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF CARSON WRIGHT**

9 I, Carson Wright, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a 19-year-old freshman and golfer on a Division 1 golf team. I am a member
11 of the Injunctive Relief Settlement Class. I object individually and on behalf of the class.

12 2. I am on partial athletic and academic scholarships. I was recruited and signed a
13 National Letter of Intent in 2023, well before the proposed roster limits.

14 3. I arrived on campus in late August 2024, feeling nervous but excited to start my
15 journey. After completing the Fall golf season and spending just eight weeks on campus, my
16 coach informed me and two teammates that, although I had done nothing wrong, I would likely
17 not have a spot on the 2025 roster due to the new roster limits.

18 4. I was given the option to enter the transfer portal in December (before it filled up
19 with other golfers in similar situations) or to play through the Spring season and then explore
20 transferring to a new school in Fall 2025 to continue playing competitive golf. I could also stay
21 at my current school as a non-athlete.

22 5. Needless to say, I am heartbroken. All that I had worked so hard for and was
23 promised to me was taken away in one short meeting.

24 6. My National Letter of Intent states that I will receive scholarship money for
25 athletic and academic achievements over four years. I earned these scholarships from all that I
26 accomplished in the classroom and in golf leading up to college.

27 7. Roster limits will take this away from me. I had no idea my dream of playing
28 Division 1 golf could be stripped from me in an instant, especially since I had done everything

1 that was asked of me. I've gone above and beyond what has been expected of me in my short
2 time at the university.

3 8. The NCAA advertises itself to be pro-student-athlete. Please help me, and many
4 others, understand how roster limits help student-athletes. How are so many student-athletes
5 who have worked so hard to be where they are in their lives now about to be displaced? Lives
6 are being turned upside down, and it seems as if rules are being changed, with no one being able
7 to fully explain why or make sense of any of it.

8 9. My coach told me I was the hardest to deliver the news to since I hadn't done
9 anything wrong. He said that I was doing everything right.

10 10. This was hard to hear. It's hard to process. None of it makes any sense. It feels
11 like a complete betrayal.

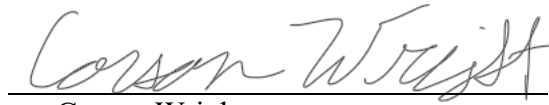
12 11. I love my current school, my teammates, and my coaches. I don't want to transfer
13 and start over, but I also don't want to give up playing the sport I truly love and have dedicated
14 myself to. I don't expect to receive NIL money or any revenue sharing that may come from this
15 settlement. I never have. I just want to represent my school by playing the sport I love, get a
16 good education, and continue on the path that was laid out for me during the recruiting process
17 and was promised to me when I signed my National Letter of Intent.

18 12. Thousands of student-athletes are going to be negatively affected by this ruling.
19 So many are hesitant to come forward or sign their name on letters due to any backlash they may
20 face by doing so.

21 13. I have been hesitant to put my name on any objection due to the potential negative
22 consequences I might face from my current school or coaches at other schools I may consider
23 transferring to. However, I feel I need to speak out for myself and for the thousands of other
24 student-athletes that are being forced into this horrible situation by no fault of their own. The
25 right thing can still be done.

26 I declare under penalty of perjury that the foregoing is true and correct.
27
28

1 Dated: Wichita, Kansas
2 January 17, 2025



Carson Wright
NCAA ECID No. 2201425903
10725 W. Central Ave.
Wichita, KS 67212

Isaac Wright
10725 W. Central Ave
Wichita, KS 67212

January 28, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Isaac Wright. I am a high school student aspiring to be a future Division I athlete, and a member of the Injunctive Relief Class. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Isaac Wright

A handwritten signature in black ink that reads "Isaac Wright". The signature is written in a cursive, flowing style.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF ISAAC WRIGHT

I, Isaac Wright, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am 17 years old and a junior in high school. I have been playing golf since I was six years old and hope to compete in college on a Division I team.

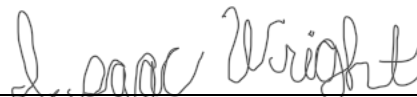
2. I understand that the settlement in this lawsuit will govern NCAA Division I sports for the next decade, which is when I will be in college. I therefore am a class member who could be affected by the terms of the settlement. I object to the settlement for myself and for other class members like me.

3. I don't know what the future holds for me, but approving roster limits may prevent me and so many others in similar situations an opportunity to do what we love and have dedicated so much of our time and energy on. It could close doors and opportunities that await me. It will hurt the future of golf and keep athletes like me from developing in college.

4. I oppose the roster limits and ask the Court not to approve them.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Wichita, KS
January 28, 2025



Isaac Wright
10725 W. Central Avenue
Wichita, KS 67212

Stella Wright
10725 W. Central Ave
Wichita, KS 67212

January 28, 2025

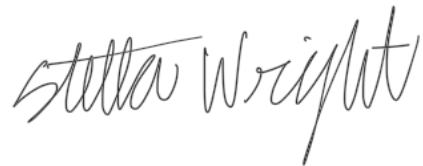
Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Stella Wright. I am a Junior in high school aspiring to be a future Division I athlete, and a member of the Injunctive Relief Class. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Stella Wright

A handwritten signature in cursive script that reads "Stella Wright". The signature is written in dark ink and is positioned to the right of the typed name.

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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8 **DECLARATION OF STELLA WRIGHT**

9 I, Stella Wright, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am 17 years old and a junior in high school. I have been playing golf since I was
11 six years old and hope to compete in college on a Division I team.

12 2. I understand that the settlement in this lawsuit will govern NCAA Division I
13 sports for the next decade, which is when I will be in college. I therefore am a class member who
14 could be affected by the terms of the settlement. I object to the settlement for myself and for
15 other class members like me.

16 3. I've been on the varsity golf team since my freshman year of high school. I
17 qualified for state golf both my sophomore and junior years. I played well enough to advance
18 to the final rounds both years.

19 4. Golf is in my blood. I have an aunt, an uncle, two cousins and brother who
20 were/are Division I golfers. My brother loves playing collegiate golf. He loves being part of a
21 team and representing his university. I see what being a member of the team has done for my
22 brother. I want that as part of my college experience, too.

23 5. I feel being part of a team will provide me a sense of belonging when I move
24 away to college. To be a Division I athlete, the expectations are high on and off the course. I
25 want those high expectations and I have worked hard to meet them. I know that being held
26 accountable and having good discipline are good motivators for me.

27 6. Colleges have already shown interest in me to play golf for them at the next level.
28 I fear that if the roster limits get passed the opportunity for me to play college golf may be taken

1 away.

2 7. Approving roster limits may prevent me and so many others in similar situations
3 an opportunity to do what we love and have dedicated so much of our time and energy on. It
4 could close doors and opportunities that await me. They are unfair to people like me who worked
5 hard to succeed in a system without roster limits, and are now having the rug pulled out under
6 us.

7 8. I ask the Court not to approve the roster limits.

8 I declare under penalty of perjury that the foregoing is true and correct.

9 Dated: Wichita, KS
10 January 28, 2025

11 
12 Stella Wright
13 10725 W. Central Avenue
14 Wichita, KS 67212
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Margaret Young
6035 25th Ave NE
Seattle, WA 98115

January 26, 2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Margaret Young. I am a current Division I athlete at the University of Washington and my NCAA ECID number is 2210686997. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Margaret Young

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE COLLEGIATE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

DECLARATION OF MARGARET YOUNG

I, Margaret Young, hereby declare as follows pursuant to 28 U.S.C. §1746:

1. I am a junior at the University of Washington and am a member of the NCAA Division I women's rowing team. I am a member of the Injunctive Relief Settlement Class and object both individually and on behalf of the class.

2. In high school, I played varsity basketball for three years. I was team captain for two years, my team's most valuable player senior year, and my league second-team senior year as well.

3. I decided to come to the University of Washington for its plethora of academic opportunities and love for the city of Seattle. The summer before my freshman year of college, I moved into the dorms early to take part in an early start program. Competing for Washington's rowing team was never on the forefront of my mind until Allie Lohrenz, head novice coach, emailed students about the walk-on program at UW. I was immediately interested and followed up with her, asking how I could best prepare myself for tryouts. She replied, asking me if I wanted to come down to the boathouse to meet with her. I made my way down to Conibear Shellhouse one afternoon. We had a great conversation about the team and the legacy of walk-ons at the UW. She showed me the champion's room and she pointed to the wall of Olympic names who rowed for Washington, pointing to the names who had learned the

1 sport in that shell house.. Our conversation ended with her offering a spot on the team and I
2 ecstatically replied “Yes”. I remember feeling over the moon that I have received the
3 opportunity of a lifetime – to learn to row at the University of Washington.

4 4. Our head coach Yaz Farooq held a team meeting to inform us of the roster cuts.
5 The room was overtaken with a silent sadness. I looked over at my teammates to see their faces
6 covered in tears. For our team, we pride ourselves on developing as athletes together. These
7 roster caps would cut our team in half meaning that people who have not gotten enough time to
8 improve would be let go. That means losing half of my teammates. If the roster caps are
9 opposed, our team can remain together and we can stay the big family that we are. We could
10 each keep developing and learning together.

11 5. Since the roster caps have been announced, I have felt the sadness take over a
12 part of the team. There is fear among us all about losing the opportunity to compete for the
13 team that we love and losing the experience of rowing with our best friends every day. Rowing
14 brings so much joy and happiness to my life and the thought of that going away makes me feel
15 crushed. I am worried and scared for myself and others.

16 6. If I were cut, my life would not be the same at all. First off, I would lose access
17 to many academic resources like academic advisors, career coaches, tutoring, early class
18 registration, and learning specialists. I would lose access to food supplies such as snacks and
19 meals provided by sports nutrition, increasing the financial burden of buying groceries as a
20 college student. My support staff would be taken away such as therapists and mental health
21 specialists. Above all, I would lose connection with the amazing coaching staff at Washington
22 and the ability to be with all of my teammates every day.

23 7. If I am rowing, I want to be a University of Washington. This is where I have
24 not only learned to row but where I have developed as an individual for the last three years. I

1 don't want to be anywhere else.

2 8. Roster limits destroy teams and opportunities for athletes of all experience
3 levels. My team thrives from being a place where people of all backgrounds can come together,
4 , and learn and develop from each other. As a walk-on athlete at the University of Washington,
5 the opportunity to learn the sport of rowing will not be possible for future athletes like myself
6 with these roster caps in place. I plead with the court to consider the dreams and hopes of
7 athletes that this hearing impacting.

8 9. I declare under penalty of perjury that the foregoing is true and correct.

9 Dated: Seattle, WA

10 January 26, 2025

11 

12
13 Margaret Young
14 NCAA ECID No. 2210686997
15 6035 25th Ave NE
16 Seattle, WA 98115
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22
23
24

Jessie Zealand
1388 Old Hickory Lane
Forest, VA 24551

1/20/2025

Re: *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW

Dear Judge Wilken:

My name is Jessie Zealand. I am a current Division I athlete at Liberty University and my NCAA ECID number is 2110337547. For the reasons stated in my attached declaration, I object to the roster limits in the settlement agreement in *In re College Athlete NIL Litigation*, No. 4:20-cv-03919-CW. I am a member of the Injunctive Relief Class. I make this objection individually and on behalf of the Injunctive Relief Class.

I designate Steven F. Molo and the firm of MoloLamken LLP to speak on my behalf at the Fairness Hearing on April 7, 2025.

Sincerely,
Jessie Zealand

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 IN RE COLLEGIATE ATHLETE NIL
5 LITIGATION

Case No. 4:20-cv-03919-CW

Hon. Claudia Wilken

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7
8 **DECLARATION OF JESSIE ZEALAND**

9 I, Jessie Zealand, hereby declare as follows pursuant to 28 U.S.C. § 1746:

10 1. I am a sophomore at Liberty University, and I am a member of the NCAA
11 Division I woman's cross-country track & field team. I am a member of the Injunctive Relief
12 Settlement Class and object both individually and on behalf of the class.

13 2. Many hours a week of my high school career were devoted to practicing making
14 the Liberty Track & Field qualification standards to be on the team, which had always been a
15 dream of mine. I practiced every day for at least 5 hours. My Dad and all my uncles had
16 previously been on the team during their time in college and I had always aspired to follow in
17 their footsteps. As a result, I had little to no close friends in my classes and many friends on my
18 team. I never went to parties, took long social trips, or stayed up late to respect my training and
19 prioritize recovery.

20 3. I had always wanted to compete for Liberty, and when I got a call one day to
21 officially visit, I informed the other D2 and D3 schools who had recruited me that I was
22 uninterested. I was immediately taken by the healthy team culture and girls who were so
23 welcoming and friendly. They made me feel like I was already on the team with them, like I was
24 family. I had no second thoughts about committing, I already knew. Being on the Liberty Cross
25 Country Track & Field team had been the greatest and most character-shaping time thus far in
26 my life. I was informed about the times I would have to make, but I was already hitting them
27 and steadily improving, so I had no worries about being cut in the future. I was promised 4 years
28 of eligibility by the coaches and in the contract I signed.

1 4. I had heard of rumors of deep cuts on the team but never actually thought that
2 they would come to pass. I finally came to terms with it when the coaches announced it at
3 Monday's team meeting and explained all the repercussions of the ruling. That was very
4 emotionally difficult for me to go through, as well as all my freshman teammates, who had only
5 been on the team for one semester but had already bonded with teammates and made deep
6 connections that they were in jeopardy of losing. Cuts are expected to come into effect in the fall
7 of 2025, but because of the announcement, many girls from our team have already left, leaving
8 a hole in the team and creating a very sad and anticlimactic end to their time at Liberty and on
9 the team. This was a very morbid day for our team, and you could feel the hopelessness and utter
10 sadness in everyone's eyes as we all attempted not to cry.

11 5. Overall, this has been very hard on me and all my teammates. It creates stress,
12 sadness, and depression at practice because those who thought they had three years left now only
13 have one semester. It changes the whole trajectory of my next three years. It is hard to imagine
14 college life without the structure, support, and comradery of my team, which I have grown
15 accustomed to from my first years as a freshman. It fills me with sadness that I will no longer
16 get to see them every day during college, that my time on the team will end abruptly, and that I
17 will not even get to finish with my graduating class and be a celebrated senior on the team.

18 6. I lose a lot if I am cut from the team. First, I lost my whole regular daily routine
19 and schedule, up to this point in my life, classes, social events, etc. revolve around practice and
20 racing. It will be quite the adjustment to still be in college but not have that routine that has
21 permeated every aspect of my life for the last three years, not counting high school as well.
22 Second, I lose close contact with all my closest friends. This will be the hardest to go through
23 and the reality that I dread the most. My friends are my lifeline, my encouragement, and many
24 times, my reason for waking up in the morning. They bring meaning and joy to my life. These
25 are friendships that we have cultivated over the last three years and are very hard to let go of.
26 Third, I will lose all of my student-athlete benefits that come with priority registration, academic
27 achievement recognition, tutoring, and academic help that is convenient, being able to eat meals
28 with teammates, go to the training room and recover.

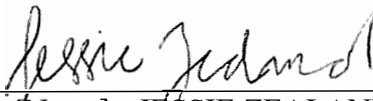
7. Even if I am cut from the team, I will still stay at Liberty to finish my undergraduate degree because I am already three years into it. My next fall will be very different, I will have to somehow fill my calendar with completely new things and find all new friends.

8. I respectfully ask the court to consider the negative impact that roster limits can have, not just on groups, but on individuals like me. In my experience, these restrictions often do more harm than good. They create unnecessary barriers that prevent people from reaching their full potential and being part of something meaningful. Roster limits foster an unhealthy competitive environment, where people feel pressured to compete against each other just to stay involved. Instead of encouraging collaboration and growth, it creates stress and discourages those who might already feel like they're on the outside looking in. For someone like me, who values the chance to contribute and improve, this kind of environment can be disheartening. More than that, roster limits take away opportunities. I've seen firsthand how deserving individuals, me included, can be excluded—not because we lack ability or passion, but because of an arbitrary number. These opportunities mean so much more than just a spot on a team or in a group; they represent a chance to grow, to learn, and to feel like you belong. I hope the court understands how deeply this can affect people. Roster limits don't just impact statistics or logistics—they impact lives. I urge you to see the value in allowing more inclusivity and opportunity so that everyone willing to work hard and contribute can have the chance to do so. Thank you for taking the time to hear me out and for considering what this means to people like me.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Forest, VA

January 20, 2025



[Name] JESSIE ZEALAND
NCAA ECID No. 2110337547
[Mailing Address]
1388 Old Hickory Ln
Forest VA 24551